

EXHIBIT 31

SKOLNICK & SHIFF, P.A.

**Attorneys at Law
2100 Rand Tower
527 Marquette Avenue South
Minneapolis, Minnesota 55402
(612) 677-7600**

**TELECOPY
(612) 677-7601**

DATE: December 17, 2009	Telecopy Number: (312) 706-8677
TO: Howard Roin, Esq.	Main number of receiving firm: (312) 701-7054
FROM: William R. Skolnick	
Number of pages including cover sheet: 16	
<p style="text-align: center;">MESSAGE:</p> <p>Please find attached Correspondence.</p>	
<p>This telecopy is intended only for the use of the addressee. If the addressee of this telecopy is a client or agent for one of our clients, you are further advised that the telecopy contains legally privileged and confidential information which we intended to send to the addressee only.</p> <p>In any event, if you are not the intended recipient of the telecopy, you are hereby notified that you have received this telecopy inadvertently and in error. Any review, dissemination, distribution or copying of this telecopy is strictly prohibited. If you have received this telecopy in error, please immediately notify us by telephone and return the original telecopy to us at the address above via the United States Postal Service. We will reimburse any costs you incur in notifying us and in returning the telecopy to us.</p>	
Please call (612) 677-7600 if you do not receive all pages.	
TELECOPY - INTEROFFICE USE	
Client/Matter No.: Hecker/Chrysler Adversary 09-05019	
Attorney: William R. Skolnick, Esq.	

SKOLNICK & SHIFF, P.A.

ATTORNEYS AT LAW
2100 RAND TOWER
527 MARQUETTE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55402-1308
(612) 677-7600 TEL. (612) 677-7601 FAX
E-MAIL skolnicklaw@visi.com

WILLIAM R. SKOLNICK
ROLIN L. CARGILL III
SEAN A. SHIFF
AMY D. JOYCE*
*ALSO LICENSED IN ILLINOIS

OF COUNSEL:
LUANN M. PETRICKA

December 17, 2009

VIA FACSIMILE

Howard Roin
Mayer Brown, LLP
71 South Wacker Drive
Chicago, Illinois 60606

Re: Chrysler Financial Services Americas, LLC. vs Dennis E. Hecker
Case File No. 09-CV-50779, Adv Pro No. 09-05019

Dear Mr. Roin:

Enclosed in the above referenced matter and hereby served upon you, please find copies of the following documents:

1. Subpoena Duces Tecum in an Adversary Proceeding for Richard A. Page;
2. Subpoena Duces Tecum in an Adversary Proceeding for Steve Leach;
3. Notice of Taking Deposition of Richard A. Page; and
4. Amended Notice of Taking Deposition of Steven Leach.

If you have any questions, feel free to contact the undersigned.

Yours truly,

SKOLNICK & SHIFF, P.A.



Zachary M. Puchtel
Legal Assistant to William R. Skolnick

WRS:zmp
Enclosure

**UNITES STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

DENNIS E. HECKER

Case No. 09-50779-RJK

Debtor.**Chapter 7****CHRYSLER FINANCIAL
SERVICES AMERICAS LLC,**

ADV Pro. No. 09-05019

Plaintiff,

vs.

**SUBPOENA DUCES TECUM IN
AN ADVERSARY PROCEEDING**

DENNIS E. HECKER,**Defendants.**

To: Richard A. Page, 1940 Fulham Street, Unit 110, Roseville MN 55113

☐ YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

ROOM

DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

SKOLNICK & SHIFF, P.A.

DATE AND TIME

2100 Rand Tower

527 Marquette Ave S., Minneapolis, MN 55402-1308

January 8, 2009 10:00 a.m.

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

SEE EXHIBIT A

PLACE

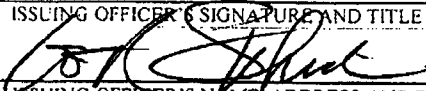
DATE AND TIME

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
 Attorney for Defendant	December 17, 2009
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	
William R. Skolnick, Esq. 2100 Rand Tower 527 Marquette Ave S., Minneapolis, MN 55402-1308 (612)677-7600	

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)

¹ If action is pending in district other than district of issuance, state district under case number.
AO88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

	DATE	PLACE
SERVED		
SERVED ON (PRINT NAME)	MANNER OF SERVICE	
SERVED BY (PRINT NAME)	TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on	DATE	SIGNATURE OF SERVER
	ADDRESS OF SERVER	

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance,

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

UNITES STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

DENNIS E. HECKER

Case No. 09-50779-RJK

Debtor.

Chapter 7

CHRYSLER FINANCIAL
SERVICES AMERICAS LLC

ADV Pro. No. 09-05019

Plaintiff,

vs.

SUBPOENA DUCES TECUM IN
AN ADVERSARY PROCEEDING

DENNIS E. HECKER,

Defendants.

To: Steve Leach, 1500 Summit Oak Court, Burnsville MN 55337

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	ROOM
	DATE AND TIME

☒ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
SKOLNICK & SHIFF, P.A.	
2100 Rand Tower	
527 Marquette Ave S., Minneapolis, MN 55402-1308	January 8, 2009 10:00 a.m.

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

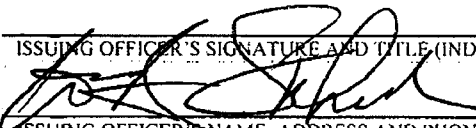
SEE EXHIBIT A

PLACE	DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf and may set forth, for each person designated,

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
 Attorney for Defendant	December 17, 2009
ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER	
William R. Skolnick, Esq. 2100 Rand Tower 527 Marquette Ave S., Minneapolis, MN 55402-1308 (612)677-7600	
(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on next page)	

¹ If action is pending in district other than district of issuance, state district under case number.
AO88 (Rev. 1/94) Subpoena in a Civil Case

PROOF OF SERVICE

	DATE	PLACE
SERVED		
SERVED ON (PRINT NAME)		MANNER OF SERVICE
SERVED BY (PRINT NAME)		TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on	DATE	SIGNATURE OF SERVER
		ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d) (2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance,
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend

trial be commanded to travel from any such place within the state in which the trial is held, or

- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or
- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or
- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in who behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:)	
)	Bankruptcy Case No: 09-50779-RJK
DENNIS E. HECKER,)	
)	Chapter 7
Debtor.)	
<hr/>)	
)	
CHRYSLER FINANCIAL)	Adversary Proceeding No.: 09-05019
SERVICES AMERICAS)	
LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
DENNIS E. HECKER,)	
)	
Defendant)	
)	

NOTICE OF TAKING DEPOSITION
OF RICHARD A. PAGE

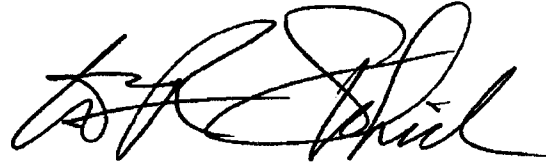
TO: Plaintiff and its counsel, Gray, Plant, Mooty, Mooty & Bennett, P.A., Nicholas Nierengarten, 500 IDS Center, 80 S. 8th St., Minneapolis, Minnesota 55402 and Mayer Brown LLP, Howard Roim and Stuart Rozen, 71 South Wacker Drive, Chicago, Illinois, 60606.

PLEASE TAKE NOTICE THAT pursuant to Bankruptcy Rules 7030 and 9016 incorporating Fed.R.Civ.P. 30 and 45 Defendant Dennis E. Hecker through his attorneys has issued a subpoena to Richard A. Page for the taking of his deposition and for the production of documents at the offices of Skolnick & Shiff, P.A., 527 Marquette Ave. S. Suite 2100, Minneapolis, MN 55402 on Friday, January 8, 2010

commencing at 10:00 a.m., and thereafter by adjournment until the same shall be completed. A copy of the Subpoena is attached as Exhibit A.

Dated: December 17, 2009

SKOLNICK & SHIFF, P.A.

A handwritten signature in black ink, appearing to read 'W.R. Skolnick', written over a horizontal line.

**William R. Skolnick # 137182
2100 Rand Tower
527 Marquette Avenue
Minneapolis, MN 55402
Phone (612) 677-7600
Fax (612) 667-7601**

ATTORNEY FOR DEFENDANT

EXHIBIT A TO RICHARD A. PAGE SUBPOENA**DEFINITIONS**

1. "Document" and "documents" are used in the broadest possible sense and shall include, any written, typed, photocopy, recorded, electronically stored information within the possession or custody or under the control of Richard A. Page or his representatives. This includes copies of the following: correspondence, notes, records, messages, memoranda, contracts, agreements, bills, reports, schedules, summaries, analyses, facsimiles, transcripts and recordings. Any drafts or revisions of any of the foregoing, any document which has or contains any attachment, enclosure, notation, addition, insertion, or marking of any kind which is not a part of another document, or any document which does not contain a comment, notation, addition, insertion, or marking which is part of another document, is to be considered a separate document.

2. The term "relating" or "relate" or "relates" or "in relation to" means, in addition to its usual and customary meaning, containing, discussing, showing, mentioning, reflecting, or referring to in any way, directly or indirectly, and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each Request.

3. The terms "you" and "your" refer to Richard A. Page and his representatives.

INSTRUCTIONS

1. Unless otherwise indicated, the documents covered by this Request include all documents which have come into existence since January 1, 2006.

2. If you contend that any document is privileged or otherwise not subject to discovery, (a) identify the withheld document by author, addressee, date, number of pages, and subject matter, (b) set forth the nature and basis for your contention that the document is not subject to discovery, and (c) identify each person to whom a copy of the withheld document was sent, or to whom the withheld document or its contents, or any

portion thereof, was disclosed.

3. If any of the documents requested below have been destroyed, or otherwise discarded, identify the document destroyed or discarded in the same manner as any documents you assert are privileged.

REQUESTS

REQUEST 1.: Any and all business diaries, appointment calendars, work planners or other means of periodically recording meetings or other engagements maintained or kept by you or on your behalf for the period of January 1, 2006 through October 31, 2009.

REQUEST 2.: All documents relating to or reflecting any and all meetings, discussions, or other communications between you and any other person referring or relating in any way to transactions between Chrysler Financial Services Americas, LLC and any business related to Dennis E. Hecker, including but not limited to all correspondence, letters, memoranda, notes, handwritten notes, files, e-mails and attachments, faxes, and any other writings, recordings or tangible things.

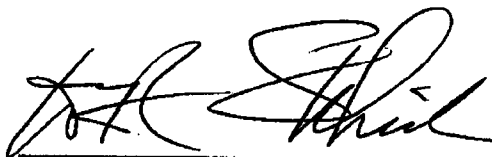
REQUEST 3.: Any and all documents that relate or refer in any way to any contracts, agreements, discussions, negotiations, or offers between Hyundai Motor America and any business related to Dennis E. Hecker or respective representatives, including but not limited to all versions, drafts, proposals, offers, counteroffers, notes, handwritten notes, memoranda, correspondence, letters, e-mails and attachments, and all other such writings or tangible things.

REQUEST 4.: Any and all documents, notes, correspondence between you and Steven Leach that relate in any way to any business related to Dennis Hecker.

REQUEST 5.: Any and all written or recorded statements you have given to anyone concerning this lawsuit or its subject matter.

Dated: December 17, 2009

SKOLNICK & SHIFF, P.A.

A handwritten signature in black ink, appearing to read 'W. R. Skolnick', written over a horizontal line.

William R. Skolnick # 137182
2100 Rand Tower
527 Marquette Avenue
Minneapolis, MN 55402
Phone (612) 677-7600
Fax (612) 667-7601

ATTORNEY FOR DEFENDANT

EXHIBIT A TO STEVEN LEACH SUBPOENA**DEFINITIONS**

1. "Document" and "documents" are used in the broadest possible sense and shall include, any written, typed, photocopy, recorded, electronically stored information within the possession or custody or under the control of Steven Leach or his representatives. This includes copies of the following: correspondence, notes, records, messages, memoranda, contracts, agreements, bills, reports, schedules, summaries, analyses, facsimiles, transcripts and recordings. Any drafts or revisions of any of the foregoing, any document which has or contains any attachment, enclosure, notation, addition, insertion, or marking of any kind which is not a part of another document, or any document which does not contain a comment, notation, addition, insertion, or marking which is part of another document, is to be considered a separate document.

2. The term "relating" or "relate" or "relates" or "in relation to" means, in addition to its usual and customary meaning, containing, discussing, showing, mentioning, reflecting, or referring to in any way, directly or indirectly, and is meant to include, among other documents, documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by each Request.

3. The terms "you" and "your" refer to Steven Leach and his representatives.

INSTRUCTIONS

1. Unless otherwise indicated, the documents covered by this Request include all documents which have come into existence since January 1, 2006.

2. If you contend that any document is privileged or otherwise not subject to discovery, (a) identify the withheld document by author, addressee, date, number of pages, and subject matter, (b) set forth the nature and basis for your contention that the document is not subject to discovery, and (c) identify each person to whom a copy of the withheld document was sent, or to whom to the withheld document or its contents, or any

portion thereof, was disclosed.

3. If any of the documents requested below have been destroyed, or otherwise discarded, identify the document destroyed or discarded in the same manner as any documents you assert are privileged.

REQUESTS

REQUEST 1.: Any and all business diaries, appointment calendars, work planners or other means of periodically recording meetings or other engagements maintained or kept by you or on your behalf for the period of January 1, 2006 through October 31, 2009.

REQUEST 2.: All documents relating to or reflecting any and all meetings, discussions, or other communications between you and any other person referring or relating in any way to transactions between Chrysler Financial Services Americas, LLC and any business related to Dennis E. Hecker, including but not limited to all correspondence, letters, memoranda, notes, handwritten notes, files, e-mails and attachments, faxes, and any other writings, recordings or tangible things.

REQUEST 3.: Any and all documents that relate or refer in any way to any contracts, agreements, discussions, negotiations, or offers between Hyundai Motor America and any business related to Dennis E. Hecker or respective representatives, including but not limited to all versions, drafts, proposals, offers, counteroffers, notes, handwritten notes, memoranda, correspondence, letters, e-mails and attachments, and all other such writings or tangible things.

REQUEST 4.: Any and all documents, notes, correspondence between you and Richard Page that relate in any way to any business related to Dennis Hecker.

REQUEST 5.: Any and all written or recorded statements you have given to anyone concerning this lawsuit or its subject matter.

EXHIBIT 32

Nierengarten, Nicholas N.

From: Zach Puchtel [ZPuchtel@skolnick-shiff.com]
Sent: Monday, December 21, 2009 1:30 PM
To: Nierengarten, Nicholas N.; hroin@mayerbrown.com
Cc: Bill Skolnick; Andrew Bardwell; LuAnn Petricka
Subject: New Privilege Log
Attachments: 20091221_NEW Priv Log.pdf

Gentlemen,

Attached to this email, please find the new Privilege Log. If you have any questions, please feel free to contact me.

Best,

Zachary M. Puchtel

Legal Assistant
Skolnick and Shiff, P.A.
2100 Rand Tower
527 Marquette Avenue South
Minneapolis, Minnesota 55402-1308
(612)677-7600 TEL. (612) 677-7601 FAX

12/22/2009

EXHIBIT 32

Privilege Log
CHRYSLER FINANCIAL SERVICES V. DENNIS E. HECKER
 Court File No. 09-050779

Date	AUTHOR/RECIPIENT: EMAIL	Description	Objection to Production
11/15/08 3:50:01 p.m.	Denny Hecker/Bruce Parker	Security Post orders from Chrysler	Attorney-Client Privilege Work-Product
11/15/08 4:06:01 p.m.	Denny Hecker/Bruce Parker/ Clint Cutler	Advice on Minneapolis Chrysler Audit	Attorney-Client Privilege; Work-Product
11/15/08 4:36:03 p.m.	Denny Hecker/Bruce Parker/Barbara Jerich/ Erik Dove	Fw: Walser proposal	Attorney-Client Privilege; Work-Product
11/15/08 4:52:04 p.m.	Denny Hecker/Clint Cutler	Conference call re: Chrysler Financial proposal	Attorney-Client Privilege; work-product; irrelevant
11/15/08 4:51:00 p.m.	Denny Hecker/Bruce Parker/Erik Dove	Luther Auto/Walser interest	Attorney-Client Privilege; Work-product
11/15/08 4:59:02 p.m.	Denny Hecker/Bruce Parker/Barbara Jerich/ Erik Dove	Luther Auto/Walser interest—advice on strategy for meeting with Walser	Attorney-Client Privilege; work-product
11/26/08 7:19:02 a.m.	Bruce Parker/Denny Hecker/ Advantage Auto employees Forwarded From Denny Hecker to Molly Kaplan with instructions to print	Proposed Advantage bankruptcy outline for letter (several emails)	Attorney-Client Privilege; work-product
11/26/08 8:18:00 a.m.	Denny Hecker/Bruce Parker/Barbara jerich/ T. Hecker/Molly Borg	Monticello store re-opening, communications for advice	Attorney-Client Privilege; work-product
11/24/08 2:37:05 p.m.	Denny Hecker/Bruce Parker/Molly Kaplan	Bellanotte Letter of Intent (Attachment)	Attorney-Client Privilege
11/3/08	Denny Hecker/David Uhlig/Erik Dove/Jody	Monarch on the Park/CO financing	Attorney-Client Privilege

10:54:03 a.m.	Edwards		and valuation	
11/3/08 11:59:05	Bruce Parker/Denny Hecker Denny Hecker forwarded to Molly Kaplan to Print	Limited Interim Agreement related to wholesale check request information	Attorney-Client Privilege	
11/5/08 8:55:03 a.m.	Denny Hecker/David Uhlig	Monarch on the Park/CO financing and valuation—suggestions for negotiation	Attorney-Client Privilege; work-product	
11/24/08 5:41:00 p.m.	Denny Hecker/Bruce Parker/ Robert Pitts/Jeff Brown/Chris McIntyre	Documents for Denny (Attachments) including bill of sale for 500 units and letters of resignation (Denny/Erik)	Attorney-Client Privilege; work-product	
11/24/08 7:41:01 p.m.	Denny Hecker/Bruce Parker/Robert Pitts/ Jeff Brown/Chris McIntyre	Questions about Documents sent by Robert Pitts	Attorney-Client Privilege; work-product	
11/25/08 1:07:00 p.m.	Denny Hecker/Bruce Parker/ Clint Cutler/Keith Phillips/Barbara Jerich	Questions re: Bank transaction refunds for Chase Bank	Attorney-Client Privilege; Work-Product	
11/25/08 2:21:00 p.m.	Denny Hecker/ Bruce Parker/ Clint Cutler/Erik Dove	Communications re: Aspen Proeprty and advice from attorneys	Attorney-Client Privilege; Work-Product	
10/1/08 7:18:05 p.m.	Susan Rhode/Denny Hecker Forwarded to T. Hecker	Communications from Rhode	Attorney-Client Privilege; Spousal privilege	
10/7/08 2:05:02 p.m.	Denny Hecker/Bruce Parker	Fw: meeting with Tom Gillman	Attorney-Client Privilege; irrelevant	
10/5/08 1:50:01 p.m.	Denny Hecker/Erik Dove/Wayne Belisle/Blackie Landreville Forwarded message from Bill Mohrman	Signature Pages for Settlement Agreement re: New Brighton	Attorney-Client Privilege	
9/29/08 8:39:09 a.m.	Denny Hecker/Bruce Parker/ Erik Dove	S/C Proposal/sales of franchises	Work-Product	
9/25/08	Denny Hecker Forwarded to Molly Kaplan	Hecker Estate/Trusts	Attorney-Client privilege; Work-	

7:43:04 a.m.	message between Bruce Parker/Denny Hecker		Product
11/16/08 3:19:02 p.m.	Denny Hecker/Bruce Parker/Erik Dove	Advice re: CFC fleet	Attorney-Client Privilege; work-product
11/16/08 3:51:05 p.m.	Denny Hecker/Bruce Parker	Communication re: M&I Bank partner financials/default	Attorney-Client Privilege; work-product
11/16/08 3:29:00 p.m.	Denny Hecker/Tam Hecker Forwarded chain of messages between Clint Cutler/Denny Hecker/ Hecker attorneys	Draft email to CFC attorney	Attorney-Client Privilege; work-product
11/16/08 3:52:01	Denny Hecker/Bruce Parker/Molly Kaplan	Fw: email from Mike Givens—financials for M&I Bank	Attorney-Client Privilege
11/16/08 3:18:03 p.m.	Denny Hecker/Bruce Parker	Fw: email from Mike Givens—questions about defaulted M&I Bank loan	Attorney=Client Privilege; Work-Product
11/16/08 3:55:04 p.m.	Denny Hecker/Bruce Parker/Barbara Jerich/Molly Kaplan	Responses to draft email to CFC attorney	Attorney-Client Privilege; work-product
11/15/08 5:03:04	Denny Hecker/Erik Dove Includes message from Bruce Parker to Denny Hecker	Communication re: Luther potential interest	Attorney-Client Privilege; work-product
11/15/08 5:08:00 p.m.	Denny Hecker/Bruce Parker/ Clint Cutler	Communication re: draft email to CFC attorney/strategy	Work-Product
11/26/08 7:20:02 a.m.	Denny Hecker fwd to Molly Kaplan to print message from Bruce Parker/Denny Hecker/ Barbara Jerich	Inver Grove VW and Hyundai Dealerships	Attorney-Client Privilege; work-product
11/10/08 10:32:05 a.m.	Denny Hecker fwd to Cindy Bowser to print message from Bruce Parker/ Erik Dove/Denny Hecker/Ralph Strangis/Clint Cutler	MA&A agreement comments and clarification	Work-Product; Attorney-Client privilege
11/10/08 10:38:04	Denny Hecker/Erik Dove/Bruce Parker/Barbara Jerich	Advice sought re: ID of Fords on lot	Attorney-Client Privilege; work-product

a.m.	Denny Hecker/ Bruce Parker/Barbara Jerich/Erik Dove	Advice sought re: Ford demand for cars	Attorney-Client Privilege; work-product
11/18/08 4:55:00 a.m.			
11/9/08 7:33:03 p.m.	Denny Hecker fwd to Erik Dove and Barbara Jerich messages from Clint Cutler/Bruce Parker/ Denny Hecker	Hecker/Advantage draft letter and advice	Attorney-Client; Work-Product
11/18/08 5:01:05 a.m.	Denny Hecker/Bruce Parker/Barbara Jerich/Erik Dove/Donna Rizner/Bruce Parker	Press Release re: Advantage	Work-Product privilege
11/7/08 3:53:05 p.m.	Denny Hecker/Bruce Parker/Erik Dove/Clint Cutler	Communications re: hold from CFC	Attorney-Client Privilege; work-product
11/7/08 9:58:04 p.m.	Denny Hecker/Cutler/Parker/Strangis/Barbara Jerich/Erik Dove	Questions re: finance hold from Chrysler Financial – advice sought	Attorney-Client Privilege; work-product
11/7/08 6:33:00 a.m.	Denny Hecker/Cutler/ Parker/ Strangis/Erik Dove	Chrysler Financial alternatives outline for DEH	Attorney-Client Privilege; work-product
11/9/08 10:06:02 a.m.	Denny Hecker/ Parker/Molly Borg/Erik Dove/Barbara Jerich/Donna Rizner	Discussions re: revised complaint	Attorney-Client privilege; Work-Product
11/18/08 4:56:05 a.m.	Denney Hecker fwd to Tam Hecker message from Denny Hecker to Tim Thorton	Revised Limited Agreement re: licensing	Spousal privilege; Attorney-Client privilege; Work-Product
11/16/08 1:07:03 p.m.	Denny Hecker/Parker/Cutler/Frank Dankovitch/Jim Gustafson/Darwin Lund/tom Schwartz	Strategy re: dealing with CFC demands for cars and cash freed through actions	Attorney-Client Privilege; work-product
2/17/09 11:03:03 a.m.	Dove to Bruce Parker/Denny Hecker/ Borg/Cutler/ Bowser	Chrysler Financial/Hecker Foreclosures draft of legal documents	Work-Product
2/18/09 4:04:03 p.m.	Hecker to Bowser to print message from Molly Borg	Documents discussed during meeting: litigation list, S/C	Work-Product

2/11/09 2:12:05 p.m.	Hecker to Bowser to Print message from Parker	Discussions re: foreclosure actions by CFC	Work-Product
2/11/09 4:15:03 p.m.	Hecker/Parker/Volk/Borg/ Cutler	Rosedale Dodge communications	Work-Product
2/11/09 9:07:05 p.m.	Hecker to Dove to print message from Jerich/Cutler/ Parker	Rosedale Dodge/Vemark LLC discussions re: actions to be taken	Work-Product
2/9/09 6:21:03 a.m.	Hecker fwd to Kaplan and Bowser to print message from Parker to Hecker/Volk/Borg/Cutler/Dove	CFC potential financial proposals	Work-Product
2/9/09 1:13:03 p.m.	Hecker to Molly Kaplan and Cindy Bowser to print message from Parker	Communication re: email sent by Parker to Dan Cadlick at Larkin Hoffman	Work-Product
2/9/09 1:31:00 p.m.	Hecker to Parker/Dove	Communications re: updates on US Bank matters	Attorney-Client privilege; Work-Product
2/4/09 5:30:03 p.m.	Hecker to Bowser to print message from J. Michael Dady/Hecker	Communications re: Hobbs Farm Equipment suit	Attorney-Client; Work-Product
2/11/09 9:05:02 p.m.	Hecker/Dankovich/Dove/Parker	Communication re: CFC and Vehicle titles	Attorney-Client privilege
2/9/09 9:43:01 a.m.	Hecker/Dove/Parker	Communication re: US Bank default	Attorney-client privilege, work-product
2/9/09 9:50:02	Hecker/T. Hecker	Communication re: US bank Financing	Spousal privilege
2/10/09 9:27 a.m.	Dove/Borg/Hecker/Paula Volk/Greg Orthun	Communications re: Hecker financial info	Work-Product
2/2/09 10:06:00	Hecker/Cutler/Borg/Volk/Parker/W.Dove/E. Dove/Eckhart/Bowser	Communication re: meeting of counsel	Work-Product

a.m.					
4/13/09 11:36:00 a.m.	Hecker fwd to Bowser to print email from Borg/Parker/Dove/Hecker	Communication re: Ford litigation	Attorney-client privilege, Work-Product		
4/13/09 11:36:02 a.m.	Hecker fwd to Bowser to print message from Bruce Parker	Communication re: Ford litigation	Attorney-client privilege, Work-Product		
4/14/09 10:14:05 a.m.	Hecker fwd to Bowser message from Molly Borg	Communication re: Wagener litigation	Attorney-client privilege, Work-Product		
4/16/09 7:31:01 a.m.	Hecker to Bowser to print message from Dove and Cutler	Communication re: selection of counsel	Attorney-Client Privilege		
4/16/09 7:31:04 a.m.	Hecker fwd to Bowser to Print message from Dove to Mohrman	Re: License and title fees	Attorney-Client Privilege		
4/5/09 7:42:52 p.m.	Cutler/Dove/Parker/Hecker/Borg/Volk	Liquidation analysis	Work-Product		
4/5/09 6:35:22 p.m.	Dove/Cutler/Parker/Hecker/Borg/Volk	Liquidation analysis	Work-product		
4/5/09 1:49:08 p.m.	Dove/Parker/Cutler/Hecker	Re: Toyota financing	Attorney-Client Privilege, work-product		
4/6/09 11:25:02 a.m.	Hecker fwd to Bowser email from Cutler	Communication re: conference call	Attorney-Client Privilege		
3/18/09 4:22:02 p.m.	Hecker fwd to Bowser to print email from Dove to Parker and Cutler	Communication re: Abra purchase agreement	Attorney-Client Privilege		
3/27/09 5:26:05 p.m.	Hecker fwd to Bowser to print email from Cutler to Dove and Parker	Re: Enterprise non-compete	Attorney-Client Privilege		

3/23/09 7:22:03 a.m.	Hecker fwd to Bowser to print message from Dove fwd from Parker	Re: Eaglerider agreement	Attorney-client privilege
3/23/09 8:49:19 a.m.	Hecker fwd to Bowser to print message from Parker	Re: Eaglerider agreement	Attorney-Client Privilege
3/23/09 8:59:53 a.m.	Hecker fwd to Bowser to Print message including Parker	Re: Eaglerider agreement	Attorney-Client Privilege
3/23/09 9:22:04 a.m.	Hecker fwd to Bowser to print message from Parker	Re: Dealership investment	Attorney-Client Privilege
3/11/09 10:50:01 a.m.	Hecker fwd to Bowser to print message from Dove to Parker and Cutler	Re: Abra deal	Attorney-Client Privilege;
3/6/09 9:31:25 a.m.	Hecker fwd to Bowser to print message from Mark Peterson	Re: Ward litigation	Attorney-client privilege
3/6/09 12:05:04 p.m.	Hecker fwd to Bowser to print message from Parker to Corey-Edstrom	Re: Enterprise agreement	Work-product
3/3/09 6:52:05 a.m.	Hecker fwd to Bowser to print message from Parker to Tim Kelly	Re: scheduling	Attorney-Client Privilege
3/4/09 9:25:27 a.m.	Hecker fwd to Bowser to print message from Parker to Brown/Hagloff/Dove/Moon	Re: Enterprise motion	Attorney-client privilege, work- product
3/4/09 1:29:36 p.m.	Hecker fwd to Bowser to print message from Parker to Corey- Edstrom/Hecker/Brown	Re: Enterprise Motion	Attorney-Client Privilege, work- product
2/28/09 1:55:05 p.m.	Hecker/ Parker/Dove/Corey-Edstrom/ and advising Larkin Hoffman attorneys	Re: Enterprise Proposed APA/sale of assets	Work-Product; Expert Work- Product

3/1/09 11:44:02 a.m.	Hecker/Parker/Dove	Re: Enterprise advice, communications	Attorney-Client Privilege; work-product
3/1/09 2:01:03 p.m.	Hecker/Parker	Re: telephone communications re: Enterprise	Attorney-Client Privilege
3/1/09 4:13:05 p.m.	Hecker/Parker/Dove	Re: Enterprise Asset negotiations	Attorney-Client; work-product
3/2/09 8:00:04 a.m.	Hecker/Parker/Dove/Jerich	Re: Enterprise business issues/advice	Attorney-Client Privilege; work-product
3/2/09 6:40:00 p.m.	Hecker to Tam Hecker fwd message from Corey-Edstrom	Re: update of Advantage proceedings	Attorney-Client Privilege; spousal privilege
2/27/09 4:34:01 p.m.	Hecker/Parker/Dove	Advice/communications re: Advantage balance sheet	Attorney-Client Privilege
2/27/09 4:34:02 p.m.	Hecker/Parker/Corey-Edstrom	Communications re: balance sheet and advice	Attorney-Client Privilege; work-product
2/27/09 4:59:00 p.m.	Hecker to Tam Hecker fwd message Parker	Re: update of communication with Enterprise	Attorney-Client Privilege
2/27/09 4:59:04 p.m.	Hecker fwd to Bowser to print message from Molly Borg (Briggs)	Re: Carlton/Rosedale deal	Attorney-Client; work-product
11/25/08 9:08:02 a.m.	Hecker to Molly Kaplan to print fwd message from Parker	Re: Eagle Rider documents	Attorney-Client Privilege
11/25/08 9:11:00 a.m.	Hecker fwd to Molly Kaplan message between Cutler/Hecker/Parker	Re: meeting with James Rubenstein at Moss & Barnett	Attorney-Client Privilege; work-product
11/25/08	Hecker fwd to Molly Kaplan to print	Re: communications concerning	Attorney-Client Privilege

9:08:04 a.m.	message from Parker/Hecker/Dove	Eagle Rider	
11/20/08 12:39:02 p.m.	Hecker/Keith Phillips/Erik Dove/ Bruce Parker	Re: creditor	Attorney-Client Privilege
11/18/08 10:54:01 a.m.	Hecker/Cutler/Dove	Re: creditor update	Attorney-Client Privilege
11/18/08 4:49:03 a.m.	Hecker/Tim Thornton (Briggs)	Re: legal advice	Attorney-Client Privilege
11/17/08 9:41:04 p.m.	Hecker/Parker/Dove/Cutler/Tim Kelly/Strangis	Re: legal advice—limited agreement	Attorney-Client Privilege
11/17/08 7:50:00 p.m.	Hecker/Parker/Tim Kelly/Dove/Cutler/Strangis	Re: legal strategy	Attorney-Client Privilege
11/17/08 9:27:00 p.m.	Hecker/Parker/Dove/Cutler/Tim Kelly/Strangis	Re: advice/legal strategy—creditors	Attorney-Client Privilege
11/17/08 6:44:01 p.m.	Hecker/Parker/Dove/Cutler/Borg	Re: Cooperation agreement/legal advice	Attorney-Client Privilege
11/17/08 6:16:04 p.m.	Hecker to Jerich reply to message that included Parker	Re: legal advice—Advantage	Attorney-Client Privilege
11/17/08 5:36:49 p.m.	Hecker/Cutler/Dove/Parker/Georgia Eckhart/Bowser	Re: meeting/legal advice	Attorney-Client Privilege
11/17/08 5:20:28 p.m.	Hecker/Cutler/Parker/Dove/Georgia Eckhart/Bowser	Re: legal strategy	Attorney-Client Privilege
11/23/08 2:18:03	Parker/Hecker/Cutler/Kaplan	Re: LOI draft—legal advice	Attorney-Client Privilege

p.m.				
11/23/08 2:11:04 p.m.	Hecker/Edwards (Aspen counsel)	Re: legal advice-properties	Attorney-Client Privilege	
11/23/08 2:09:04 p.m.	Hecker/Parker/Dove/Jerich/Kaplan	Re: Legal strategy/advice	Attorney-Client Privilege; Work-Product	
11/23/08 1:50:01 p.m.	Hecker/Susan Miller/Barbara Jerich fwd message from Clint Cutler	Re: payroll—legal advice	Attorney-Client Privilege	
11/22/08 1:58:01 p.m.	Hecker/Parker	Re: legal advice	Attorney-Client Privilege	
11/22/08 1:29:05 p.m.	Hecker/Parker/Cutler	Re: update on properties/strategy	Attorney-Client Privilege; work-product	
11/22/08 1:56:04 p.m.	Hecker/Parker/Cutler	Re: Phantom	Attorney-Client Privilege	
12/22/08 1:02:02 p.m.	Hecker/Dankovich/Parker/Dove (chain)	Re: update—Open requests (Rosedale)	Attorney-Client Privilege	
12/22/08 4:37:02 p.m.	Hecker/Cutler	Re: update	Attorney-Client Privilege	
12/22/08 2:02:04 p.m.	Hecker/Cutler	Re: update – Chrysler	Attorney-Client Privilege	
12/22/08 4:46:03 p.m.	Hecker/Dove Copied to Parker	Re: Hertz	Attorney-Client Privilege	
12/22/08 5:33:02	Hecker/ Dove fwd of email between Parker/Hecker (chain)	Re: legal advice—Expedia	Attorney-Client Privilege	

p.m.					
12/22/08 7:59:03 p.m.	Hecker/Parker/Dove/Cutler		Re: legal advice/strategy	Attorney-Client; work-product	
10/16/08 3:18:01 p.m.	Hecker/Dove/Parker/Dave Thomas		Re: legal advice/communications	Attorney-Client Privilege	
10/16/08 3:15:01 p.m.	Cutler/Dove/Parker/Dave Thomas/Susan Miller		Re: legal strategy/advice-CF actions	Attorney-Client Privilege	
10/18/08 1:31:01 p.m.	Hecker/Parker/Cutler/Dove		Re: seeking legal advice-Inver Grove Hyundai	Attorney-Client; work-product	
10/18/08 2:40:00 p.m.	Hecker/Dove/Jerich/Cutler chain including Parker		Re: legal advice-Inver Grove	Attorney-Client Privilege	
10/19/08 7:01:01 p.m.	Hecker/Parker/Dove		Re: legal advice, questions US Bank documents	Attorney-Client Privilege; Work-Product	
10/19/08 8:04:04 p.m.	Hecker/T. Hecker fwd email from Dove/Hecker/Parker		Re: legal advice/security issues	Attorney-Client; work-product; spousal privilege	
10/19/08 8:45:03 p.m.	Hecker/Cutler		Re: legal advice/security issues	Attorney-Client Privilege	
10/20/08 6:02:03 a.m.	Hecker/Cutler/Parker/Dove		Re: Hecker email/legal advice	Work-Product	
8/5/08 10:10:03 a.m.	Hecker/Parker/Dove		Re: strategy for DTG	Attorney-Client; Work-Product	
8/1/08 5:53:04 p.m.	Hecker/Kaardal/Dove		Re: Trial preparation	Attorney-Client; work-product	

7/30/08 2:35:04 p.m.	Hecker fwd to Molly Kaplan to print message including Parker	Re: attachment/control agreement	Attorney-Client Privilege
10/16/08 8:58:05 a.m.	Hecker/Strangis/Parker/Dove	Re: legal advice	Attorney-Client Privilege
10/13/08 2:46:05 p.m.	Hecker/Susan Gelinske (Briggs)/ Erik Dove	Re: legal fees	Attorney-Client Privilege
12/15/08 10:04:03 a.m.	Hecker to Tam Hecker to print message from Molly Borg (Briggs)	Re: trial preparation	Attorney-Client; work-product
12/15/08 15:52:51 p.m.	Hecker to Cindy Bowser to print fwd message from Bruce Parker	Re: Hertz materials	Attorney-Client; work-product
12/15/08 6:54 a.m.	Hecker/Parker/Erik Dove	Re: legal advice/ CFC creditors	Attorney-Client Privilege
12/15/08 2:20:02 p.m.	Hecker/Parker	Re: legal advice/strategy	Attorney-Client Privilege; Work-Product
12/15/08 3:03:01 p.m.	Hecker fwd to Dove message from Parker	Re: questions on Canadian Federal Court legal strategy	Attorney-Client; work-product
10/19/08 7:50:04 p.m.	Hecker/Parker/Dove/Cutler	Re: draft letter to CFC	Attorney-Client; Work-Product
12/18/08 10:39:04 a.m.	Hecker/Dove reply to message including Cutler	Re: Financing/Legal advice	Attorney-Client Privilege; work-product
12/18/08 11:16:02 a.m.	Hecker/Jody Edwards (Aspen atty)	Re: Monarch on the Park financing	Attorney-Client
12/3/08 5:40:01	Hecker fwd to Molly Kaplan to print messages From Tim Thorton and Susan	Re: litigation memo	Work-Product

p.m.	Miller			
12/3/08 6:31:05	Hecker/Erik Dove/Bruce Parker	Re: Hyundai	Attorney-Client privilege	
p.m.				
12/7/08 10:11:03	Hecker/Dover/Parker/Cutler	Re: strategy	Attorney-Client Privilege	
p.m.				
12/8/08 4:28:02	Hecker/Dove fwd message from Clint Cutler and Bruce Parker	Communications Re: bankruptcy filing	Attorney-Client Privilege	
p.m.				
12/8/08 4:31:05	Hecker/Dove fwd messages from Cutler and Parker	Communications re: bankruptcy	Attorney-Client Privilege	
p.m.				
12/8/08 8:43:00	Hecker fwd to Tam Hecker messages from Molly Borg/Paula Volk/Parker/Cutler	Communications re: strategy	Attorney-Client Privilege, spousal privilege	
p.m.				
12/8/08 8:43:05	Hecker/Borg/Parker/Dove	Communications re: Litigation strategy	Attorney-Client Privilege; work product	
p.m.				
12/9/08 11:55:02	Hecker fwd to Molly Kaplan to print message from Susan Miller to Bruce Parker and Denny Hecker	Communications re: real estate legal advice	Attorney-Client Privilege	
a.m.				
12/9/08 11:58:00	Hecker/Jerich/Parker/Dove	Communications seeking legal advice re: employee requests	Attorney-Client Privilege	
a.m.				
12/9/08 5:18:01	Hecker to Dove reply to message from Molly Borg	Communications re: settlement negotiations	Attorney-Client Privilege; Work-product	
p.m.				
12/9/08 8:26:02	Hecker/Parker/Dove	Communications re: strategy	Attorney-Client Privilege	
p.m.				
12/10/08 11:26:00	Hecker fwd to Molly Kaplan to print message from Bruce Parker	Communications re: Hertz negotiations	Attorney-Client Privilege; work-product	
a.m.				

12/10/08 12:37:05 p.m.	Hecker fwd to Molly Kaplan to print message from Bruce Parker	Communications re: Hertz negotiations	Attorney-Client Privilege; work- product
12/10/08 3:40:02 p.m.	Hecker fwd to Molly Kaplan to print message from Bruce Parker	Communications re: Inver Grove VW	Attorney-Client Privilege
12/10/08 3:42:05 p.m.	Hecker/Dove/Parker/Jerich	Communications re: Inver Grove VW	Attorney-Client Privilege
12/11/08 12:12:02 p.m.	Hecker/Parker	Communications re: legal strategy	Attorney-Client Privilege
12/11/08 1:07:02 p.m.	Hecker/Dove/Dankovich/Parker	Communications re: legal strategy	Attorney-Client Privilege
12/11/08 3:22:02 p.m.	Hecker/Parker	Communications re: strategy	Attorney-Client Privilege
12/11/08 3:53:05 p.m.	Hecker/Dove/Parker	Communications re: GMAC	Attorney-Client Privilege
10/20/08 8:32:01 p.m.	Hecker fwd to Tam Hecker message from Dove to Parker and Hecker	Communications re: Hertz negotiations	Attorney-Client Privilege; Spousal privilege
10/20/08 9:15:03 p.m.	Hecker reply to message from Dove to Hecker and Parker	Communications re: Hertz negotiations	Attorney-Client Privilege
10/21/08 2:57:00 p.m.	Hecker/Parker	Communications re: financing	Attorney-Client Privilege
10/21/08 3:14:03 p.m.	Hecker/Parker/Dove	Communication re: Inver Grove financing	Attorney-Client Privilege
10/21/08	Hecker/Kelly/Parker/Cutler	Communications re: Advantage	Attorney-Client Privilege

3:16:01 p.m.				
10/21/08 4:06:03 p.m.	Hecker fwd to Dove messages To Parker, Cutler and Barbara Jerich	Communications re: strategy	Attorney-Client Privilege	
10/21/08 4:04:00 p.m.	Hecker/Dove/Parker/Jerich/Cutler/Kelly	Communication re: strategy	Attorney-Client Privilege	
10/21/08 6:42:02 p.m.	Hecker/Keith Phillips/Dove/Parker	Communication re: Suzuki invoices	Attorney-Client Privilege	
10/21/08 6:48:02 p.m.	Hecker/Keith Phillips/Dove/Parker	Communications re: Suzuki invoices	Attorney-Client Privilege	
10/21/08 7:55:02 p.m.	Hecker/Parker	Fwd: attachment re: financing	Attorney-Client Privilege; work-product	
10/21/08 7:55:03 p.m.	Hecker/Parker	Communications re: financing	Attorney-Client Privilege; work-product	
10/22/08 5:55:02 a.m.	Hecker/Parker	Communication re: strategy	Attorney-Client Privilege	
10/22/08 8:00:01 a.m.	Hecker/Dove reply to message from Bruce Parker	Communications re: Chrysler strategy	Attorney-Client Privilege	
10/22/08 8:00:03 a.m.	Hecker fwd to Tam Hecker and Barbara Jerich message from Bruce Parker	Communication re: Chrysler strategy	Attorney-Client Privilege; Spousal privilege	
10/22/08 10:02:02 a.m.	Hecker/Molly Kaplan/Jeff Ward/Dove/Tim Kelly	Communication re: legal strategy	Attorney-Client Privilege	
10/22/08 11:18:05	Hecker/Dankovich/Dove/Parker	Communication	Attorney-Client Privilege	

a.m.	Hecker/Jody Edwards		Communications re: real estate financing	Attorney-Client Privilege
12/18/08 11:16:04 a.m.				
12/18/08 11:18:00 a.m.	Hecker/Dove/ Richard Olson fwd of message form Jody Edwards		Communications re: real estate financing	Attorney-Client Privilege
12/18/08 1:41:04 p.m.	Hecker/Parker/Cutler		Communications re: Hyundai legal strategy	Attorney-Client Privilege
12/18/08 1:54:01 p.m.	Hecker/Parker/Cutler/Dove		Communications re: Hyundai legal strategy	Attorney-Client Privilege
12/18/08 1:54:04 p.m.	Hecker/Parker/Dove/Bowser		Communication re: Advantage	Attorney-Client Privilege
12/18/08 1:56:03 p.m.	Hecker/Dove/Parker		Communications re: Oak Park Heights	Attorney-Client Privilege
12/18/08 7:12:04 p.m.	Hecker/Parker/Dove		Communications re: Ford vehicles	Attorney-Client Privilege
12/19/08 6:14:00 a.m.	Hecker/Cutler/Parker/Dove		Communications re: Ford vehicles	Attorney-Client Privilege
12/19/08 10:58:05 a.m.	Hecker/Dove/Parker/Cutler		Communication re: appraisal	Attorney-Client Privilege
12/19/08 10:51:05 a.m.	Hecker/Bright/Cutler/Parker/Jerich/Dove		Communications re: Ford vehicles	Attorney-client privilege
12/19/08 11:07:05 a.m.	Hecker/Parker/Cutler/Dove/Jerich		Communications re: warranty dispute	Attorney-Client Privilege

12/19/08 11:11:02 a.m.	Hecker/Bright reply to message from Cutler	Communications re: Ford vehicles	Attorney-Client Privilege
12/19/08 3:04:04 p.m.	Hecker/Parker	Communications re: legal strategy	Attorney-Client Privilege
12/19/08 4:35:00 p.m.	Hecker/Parker/Jerich	Communication re: strategy	Attorney-client privilege
12/19/09 4:47:00 p.m.	Hecker/Cutler/Parker/Dove	Communication re: legal strategy	Attorney-client privilege; Work-Product
12/19/08 8:03:02 p.m.	Hecker/Parker/Dove/Cutler	Communications re: financing	Attorney-client privilege
12/19/08 8:07:02 p.m.	Hecker/Parker	Communications re: sale of dealership	Attorney-client privilege
12/19/08 8:10:00 p.m.	Hecker/Parker/Dove/Cutler	Communication re: scheduling, strategy	Attorney-client privilege
12/19/08 8:13:02 p.m.	Hecker/Parker/Dove	Communication re: real estate	Attorney-client privilege
12/20/08 11:19:00 a.m.	Hecker/Dove/Cutler	Communications re: Bank regulators	Attorney-client privilege
12/20/08 11:34:05 a.m.	Hecker/Cutler	Communications re: bank audit	Attorney-client privilege
12/20/08 11:35:01 a.m.	Hecker/Cutler	Communications re: Foreclosure agreement	Attorney-client privilege; work product
12/20/08	Hecker/Parker	Communications re: Foreclosure	Attorney-client privilege; work

2:36:03 p.m.		agreement	product
12/20/08 2:52:05 p.m.	Hecker/Cutler/Parker/Dove	Communications re: foreclosure agreement	Attorney-client privilege; work product
12/20/08 3:33:03 p.m.	Hecker/Dove replying to emails from Cutler and Parker	Communications re: foreclosure agreement	Attorney-client privilege; work product
12/20/08 3:36:00 p.m.	Hecker/Cutler/Parker/Dove	Communications re: foreclosure agreement	Attorney-client privilege; work product
12/21/08 5:46:04 p.m.	Hecker/Parker	Communications re: foreclosure agreement	Attorney-client privilege
12/21/08 10:39:05 p.m.	Hecker/Parker	Communication re: strategy	Attorney-client privilege
12/22/08 12:34:03 p.m.	Hecker/T. Hecker Fwd of email from Parker	Communications re: foreclosure agreement	Attorney-client privilege; work-product; spousal privilege
12/15/08 4:07:00 p.m.	Hecker/Dove Fwd of email from Parker	Communication re: Advantage	Attorney-client privilege
12/15/08 7:53:04 p.m.	Hecker/Dove/Cutler	Communication re: Financing	Attorney-client privilege
12/16/08 7:30:05 a.m.	Hecker fwd to Molly Kaplan to print messages from Parker and Dove	Communications re: Hertz	Attorney-client privilege; work-product
12/16/08 8:41:01 a.m.	Hecker/Cutler	Communications re: hertz	Attorney-client privilege
12/16/08 11:35:03	Hecker/Dove reply to email from Cutler	Communications re: Foreclosure agreement	Attorney-client privilege

a.m. 12/16/08 3:08:20 p.m.	Hecker fwd to Bowser email from Parker	Communications re: Foreclosure agreement	Attorney-client privilege
12/16/08 3:10:31 p.m.	Hecker fwd to Bowser to print email from Parker	Communications re: foreclosure agreement	Attorney-client privilege; work-product
12/16/08 3:07:58 p.m.	Hecker fwd to Bowser to print email from Parker	Communications re: foreclosure agreement	Attorney-client privilege; work-product
12/17/08 10:45:19 a.m.	Hecker fwd to Kaplan and Bowser email from Molly Borg	Communications re: Motorplexx litigation	Attorney-client privilege; work-product
12/17/08 10:57:00 a.m.	Hecker fwd to Tam Hecker message from Moly Borg	Communications re: Motorplexx litigation	Attorney-client privilege; work-product; spousal privilege
12/17/08 12:03:03 p.m.	Hecker/Parker/Dove	Communications re: US bank	Attorney-client privilege
12/17/08 5:33:03 p.m.	Hecker/Gustafson/Dove fwd message from Bruce Parker	Communications re: US bank financing	Attorney-client privilege
12/17/08 5:36:00 p.m.	Hecker fwd to Molly Kaplan to print message from Bruce Parker	Communications re: Advantage	Attorney-client privilege
12/17/08 6:29:02 p.m.	Hecker/Gustafson replies to message from Bruce Parker	Communications re: US bank financing	Attorney-client privilege
10/22/08 12:19:01 p.m.	Email chain from Denny Hecker to Frank Dankovich, Bruce Parker, Eric Dove	DCS	Attorney-Client Privilege Work-Product
10/22/08 12:22:03 p.m.	Email chain from Denny Hecker to Frank Dankovich, Bruce Parker, Eric Dove	Legal Strategy	Attorney-Client Privilege; Work-Product

10/22/08 12:25:03 p.m.	Email from Denny Hecker to Keith Phillips/Erik Dove/Bruce Parker/Ralph Strangis	Re: records requested by Chrysler	Attorney-Client Privilege
10/22/08 3:25:06 p.m.	Denny Hecker to Barbara Jerich forwarding email from Dove to Parker	Re: issue with Ford and Chrysler	Attorney-Client Privilege
10/22/08 7:34:04 p.m.	Denny Hecker/Bruce Parker/Clint Cutler/Dove/Jerich/Terhaar	Legal Strategy	Attorney-Client Privilege
10/23/08 12:26:00 p.m.	Denny Hecker/Bruce Parker	Chrysler EFT Audit	Attorney-Client Privilege; work-product
10/23/08 12:38:04 p.m.	Denny Hecker, Dave Thomas, Bruce Parker, Eric Dove	Information requested by Chrysler	Attorney-Client Privilege; work-product
10/23/08 4:14:01 p.m.	Hecker fwd to Tamitha Hecker message from Susan Rhode	Divorce	Attorney-Client Privilege; work-product; spousal privilege; irrelevant
10/23/08 5:18:05	Denny Hecker, fwd to Eric Dove, message from Jim Gustafson to Bruce Parker Frank Dankovich, Thomas Schwarts, Cheryl Helfricht	Status of vehicles	Attorney-Client Privilege; work-product
10/23/08 6:48:05 p.m.	Denny Hecker, Bruce Parker	ACH Returns	Attorney-Client Privilege; work-product;
10/23/08 8:21:05 p.m.	Denny Hecker, Bruce Parker, Erik Dove	Status of lawsuit	Attorney-Client Privilege; work-product
10/23/08 10:07:03 p.m.	Denny Hecker to Frank Dankovich fwd message from Bruce Parker to Paula Volk (Briggs), Molly Borg (Briggs), Hecker/Dove	Audit Results	Attorney-Client Privilege; work-product
10/24/08 7:01:02 a.m.	Hecker fwd to Bowser to print chain including message from Bruce Parker	Dealership Operating Requirements	Attorney-Client Privilege; work-product

10/24/08 7:02:00 a.m.	Denny Hecker to Bruce Parker, Erik Dove, Barbara Jerich, Clint Cutler, Ralph Strangis	Dealership Operating Requirements	Attorney-Client Privilege; work-product
10/24/08 10:20:03 a.m.	Denny Hecker to Barbara Jerich, Bruce Parker Eric Dove	Scanned attachment	Attorney-Client Privilege; Work-Product
10/24/08 12:59:03	Denny Hecker to Clint Cutler, Eric Dove, Bruce Parker fwd message from Keith Phillips Keith Phillips	Ford Incentive Money	Attorney-Client Privilege; Work Product
10/24/08 2:42:02 p.m.	Hecker fwd to Bowser and Kaplan to print message from Dove to Parker and Hecker	Leach employment agreement non-disparagement language	Attorney-Client Privilege; irrelevant
10/24/08 5:10:00 p.m.	Denny Hecker to Roger Bjork, Dove, Parker, Cutler, Strangis, Jerich	Legal strategy	Attorney-Client Privilege; work-product
10/24/08 5:11:05 p.m.	Denny Hecker to Dove, Jerich, Parker	Media	Attorney-Client Privilege
10/25/08 11:45:02 a.m.	Denny Hecker fwd to Dove, Parker, Cutler message from Carrie Hangerud	Chrysler Rep	Attorney client privilege, work-product
10/25/08 12:24:04 p.m.	Denny Hecker to Cal Kuhlman, Parker	Call from Hyundai	Attorney-Client privilege; Work-Product
9/23/08 9:21:00 a.m.	Denny Hecker fwd to Parker message from Dove	Legal strategy	Attorney-Client Privilege; work-product
9/22/08 12:39:01 p.m.	Denny Hecker/Bruce Parker	Legal fee issue	Attorney-Client Privilege;
9/19/08 8:55:02 a.m.	Denny Hecker, Molly Borg	Warrant – dog issue	Attorney-Client Privilege; work-product; irrelevant
9/19/08	Denny Hecker fwd to Dove chain including	Warrant – dog issue	Attorney-Client Privilege; work

11:57:01 a.m.	Borg		product, irrelevant
9/19/08 12:12:01 p.m.	Denny Hecker fwd to T. Hecker chain including Borg	Warrant – dog issue	Attorney-Client Privilege; work-product; irrelevant
9/18/08 12:12:05 p.m.	Denny Hecker to Dove re: messages including Borg	Warrant – dog issue	Attorney-Client Privilege; work-product; irrelevant
9/18/08 1:03:03 p.m.	Denny Hecker to Dove re: messages including Borg	Warrant – dog issue	Attorney-client privilege; work-product; irrelevant
9/18/08 5:49:03 p.m.	Denny Hecker fwd to Molly Borg message from T. Hecker re: warrant	Warrant – dog issue	Attorney-client privilege, work product; irrelevant;
9/17/08 6:05:02 a.m.	Denny Hecker, to Dove re: messages from Tim Davis (CA attorney), William Blasser (attorney) Jose Cordova (attorney), William Hannan (attorney), Justin Davis	Mendoza v. Autocal, LLC d/b/a Redwood City Dodge and Triad Financial	Attorney-Client Privilege; work-product; irrelevant
9/17/08 6:48:01 a.m.	Denny Hecker to Susan Rhode	Divorce	Work-Product; Attorney-Client privilege; irrelevant
9/16/08 3:00:01 p.m.	Denny Hecker to Susan Rhode	Divorce	Attorney-Client Privilege; work-product; irrelevant
8/23/08 12:17:04 p.m.	Hecker, Parker, Dove	Advice sought re: letter	Attorney-Client Privilege; work-product
8/26/08 4:17:08 p.m.	Denny Hecker fwd to Molly Kaplan message originating from Cynthia Moyer at Fredrickson	Past Due Account	Attorney-Client; Work-Product
8/26/08 6:33:00 p.m.	Denny Hecker to Susan Rhode	Divorce	Work-Product privilege; attorney client privilege; irrelevant
11/28/08	Denny Hecker, Parker, Dove	Redlined Redemption Agreement	Attorney-Client Privilege; work-

7:16:03 p.m.				product
11/27/08 9:42:04 a.m.	Denny Hecker to Dove, re message from Parker	Eaglerider		Attorney-Client Privilege; work-product; irrelevant
11/27/08 9:43:02 a.m.	Denny Hecker to Parker	Email from Fritz – termination of franchise		Attorney-Client privilege; Work-Product; irrelevant
11/27/08 10:49:03 a.m.	Denny Hecker to Parker	Eaglerider		Attorney-Client privilege; Work-Product; irrelevant
11/27/08 10:51:02 a.m.	Denny Hecker fwd to Jeff Brown, McIntyre, Peter Wurner message from Parker	Eaglerider term sheet		Attorney-Client Privilege; work-product; irrelevant
11/27/08 11:26:00 a.m.	Denny Hecker fwd to T. Hecker message from Parker	Eaglerider term sheet		Attorney-Client Privilege; work-product; irrelevant
11/27/08 3:35:04 p.m.	Denny Hecker to McIntyre chain including Parker	Eaglerider term sheet		Attorney-Client Privilege; work-product; irrelevant
11/28/08 8:27:03 a.m.	Denny Hecker, Parker, Dove	Discussions with 3 rd party onlines		Attorney-Client Privilege; work-product;
11/28/08 11:04:04 a.m.	Denny Hecker, Parker, Cutler, Dove, Dankovich, Gustafson	Forward of email from Rozen re: return of vehicles		Attorney-Client Privilege; work-product; irrelevant
11/28/08 11:32:01 a.m.	Denny Hecker, Cutler, Parker	Return of vehicles		Attorney-Client Privilege; work-product;
11/28/08 12:09:02 p.m.	Denny Hecker, Dove, Parker, Kaplan	Lines of Credit from US Bank		Attorney-Client Privilege; work-product;
11/26/08 2:02:01	Denny Hecker, Parker, Dove, Dave Thomas	GMAC		Attorney-Client Privilege; work-product; irrelevant

p.m. 11/26/08 2:18:02	Hecker fwd to Dankovich message to Parker	Hertz	Attorney-Client privilege; Work-Product
p.m. 11/26/08 2:39:01	Hecker, Parker, Dove	Release of passwords to Bowker	Attorney-Client; Work-Product
p.m. 11/26/08 4:46:00	Denny Hecker to Parker	Term sheet for ERF redemption	Attorney-Client Privilege; work-product;
p.m. 11/26/08 7:19:02	Denny Hecker fwd to McIntyre, message from Dove to Pitts and Parker	Eaglerider Finance Redemption / Note Extension	Attorney-Client Privilege; work-product; irrelevant
p.m. 11/26/08 7:31:01	Denny Hecker fwd to Tamitha Hecker	Eaglerider Finance Redemption / Note Extension	Attorney-Client Privilege; work-product; irrelevant
p.m. 2/2/09 11:13:06	Denny Hecker fwd to Bowser to print message from Bruce Parker	Twin Cities Automotive Agreements	Attorney-Client Privilege; work-product
p.m. 1/27/09 11:02:03	Denny Hecker fwd to Bowser to print, message from Parker	Draft asset purchase agreement with Hertz	Attorney-Client Privilege; work-product;
a.m. 1/28/09 8:28:00	Denny Hecker to Robert Moon, chain including Parker, Cutler, Corey-Edstrom	Asset Purchase Agreement from Hertz	Attorney-Client Privilege; work-product;
a.m. 1/28/09 8:54:04	Hecker, Parker, Dove	Hertz Asset Purchase	Attorney-client privilege, Work-Product
a.m. 1/28/09 9:03:00	Hecker, Parker, Dove	Hertz Asset Purchase	Attorney-Client Privilege; work-product;
a.m. 1/28/09 9:28:00	Hecker, Parker, Cutler, Volk (Briggs), Borg	Reingold v. ARAC	Attorney-Client Privilege; work-product; irrelevant

1/28/09 10:12:04 a.m.	Hecker, Parker, Dove,		ABRA Business appraisal	Attorney-Client Privilege; work-product; irrelevant
10/22/08 3:07:05 p.m.	Hecker fwd to Ka[plan to print, message from Susan Gelske (Briggs) to Hecker and Volk		Request for Information about member contributions	Attorney-Client Privilege, work-product
10/22/08 3:13:00 p.m.	Hecker to Dove		Information Inquiry	Work-product
10/23/08 10:00:04 p.m.	Hecker, Dove, Parker, Strangis		Hertz discussions	Attorney-Client Privilege, work-product
10/23/08 5:23:04 p.m.	Hecker fwd to Dove message to Parker and Hecker from Gustafson		Incentive Agr with Chrysler	Work product
10/16/08 4:24:02 p.m.	Hecker, Dove, Parker		DTG status	Attorney-Client Privilege; work-product;
8/7/08 1:45:03 p.m.	Hecker, Dale Schneider, Dave Thomas, Gustafson		Toyota payoffs	Work-product;
8/7/08 8:15:01 a.m.	Hecker, Dove		Wells Fargo	Work product
8/8/09 3:07:00 p.m.	Hecker Miller		Payments going out	Work product
1/28/09 10:45:04 a.m.	Hecker, Parker, Dove		ABRA	Attorney-Client Privilege; work-product; irrelevant
1/28/09 11:29:00 a.m.	Hecker, Dove, Cutler		Letters served	Attorney-Client Privilege
1/23/09	Hecker fwd to Bowser to print message from		Bellanotte	Attorney-Client Privilege; work-

10:27:24 a.m..	Parker to Kelly (Dorsey)			product; irrelevant
1/27/09 12:24:05 p.m.	Hecker, Becky Braun, Parker	Jeff Sell Rent		Attorney-Client Privilege; work-product; irrelevant
1/24/09 12:03:05 p.m.	Hecker fwd to Tamitha Hecker, Jake Hecker message from Cutler	Service of Chrysler Complaint		Attorney-Client Privilege;
1/24/09 12:18:04 p.m.	Hecker, Cutler, Dove, Parker, Volk	Chrysler Complaint		Attorney-client privilege
1/24/09 12:30:02 p.m.	Hecker fwd to Tamitha Hecker message from Parker	Chrysler Complaint		Attorney-Client Privilege; work-product;
1/24/09 12:39:05 p.m.	Hecker, Borg	Conference Call		Attorney-Client Privilege; work-product;
1/24/09 12:46:05 p.m.	Hecker, Borg	Conference Call		Attorney-client privilege, work-product
1/24/09 5:59:01 p.m.	Hecker, Borg, Dove, Parker, Cutler, Volk	Statement		Attorney-Client Privilege, work-product
1/25/09 11:14:00 a.m.	Hecker, Borg	Call re Statement		Attorney-Client Privilege; work-product;
1/25/09 11:22:03 a.m.	Hecker, Borg	Statement		Attorney-Client Privilege; work-product;
1/20/09 5:05:02 p.m.	Hecker, Parker	Vehicles at non-Manheim repair facilities		Attorney-Client Privilege; work-product;
1/22/09 3:48:03	Hecker, Rhode	Divorce		Attorney-Client Privilege; work-product; irrelevant

p.m. 1/22/09 6:27:02 p.m.	Hecker, Dove, Cutler		Wells Fargo loans	Attorney-Client Privilege; work-product; irrelevant
1/22/09 6:32:05 p.m.	Hecker, Parker, Jerich, Dove		Parking Lease Agreement	Attorney-Client Privilege; work-product; irrelevant
1/22/09 8:51:00 p.m.	Hecker, Rhode		Update of status	Attorney-Client Privilege
4/23/09 3:45:31 p.m.	Parker, Michael Dady, Hecker, Dove, Bowser, Kaplan		GMC deals	Attorney-Client Privilege;
4/23/09 3:50:15 p.m.	Parker, Dove, Bowser, Kaplan,		Attachment to GMC	Attorney-Client Privilege;
1/21/09 9:33:03 a.m.	Hecker to Dove fwd message from Parker to Kam Talebi		Bellanotte	Attorney-Client Privilege; Irrelevant
1/21/09 10:31:03 a.m.	Hecker, Rhode		Divorce	Attorney-Client Privilege; irrelevant
1/21/09 4:39:01 p.m.	Hecker, Parker, Jerich, Dove, Parker, Jerich		Hasselquist Management	Attorney-Client Privilege; irrelevant
1/21/09 11:44:02 p.m.	Hecker to Parker, Talebi, Dove		Bellenotte	Attorney-Client Privilege; irrelevant
1/22/09 10:56:05 a.m.	Parker, Hecker		Totaled Land Rover	Attorney-Client Privilege
1/16/09 7:30:01 a.m.	Hecker, Dove, Parker		TARP Bill	Attorney-Client Privilege; Irrelevant

1/17/09 6:31:04 p.m.	Hecker, Parker, Cutler, Dove	Advantage IOI	Attorney-Client Privilege; work product
1/18/09 9:44:03 p.m.	Parker, Cutler, Dove	Advantage IOI	Attorney-Client Privilege; work product
1/19/09 9:01:03 a.m.	Parker, Hecker	Advantage IOI	Attorney-Client Privilege; work-product;
1/19/09 9:04:00 a.m.	Hecker to Parker, Miller, Schwartz, Gustafson, Dove	Financing of Land Rover	Attorney-Client Privilege; work-product;
1/19/09 9:26:00 a.m.	Hecker fwd to Tamitha Hecker, message including Parker, Miller, Schwartz, Dove, Parker	Land Rover	Attorney-Client Privilege;
1/19/09 9:35:00 a.m.	Hecker fwd to Parker, Miller, Dove, Jerich message from Tom Schwartz	Land Rover	Attorney-Client Privilege;
1/19/09 9:56:01 a.m.	Hecker to Gustafson fwd message from Parker	Land Rover Insurance Proceeds	Attorney-Client Privilege
1/19/08 10:23:05 a.m.	Hecker, Parker	Canadian Trademark Litigation	Attorney-Client Privilege; work product;
12/2/08 11:10:02 a.m.	Hecker, Dove re: message from Borg	Romano v. Advantage	Attorney-Client Privilege; work product
12/2/08 1:29:03 p.m.	Hecker to Dove fwd of message to Parker	Travelocity	Attorney-Client Privilege
12/2/08 1:33:05 p.m.	Hecker, Parker	Sydney Holdings	Attorney-Client Privilege; work product
12/2/08	Hecker to Dove re: message to Parker	Advantage financials	Attorney-Client Privilege; work

7:17:00 p.m.				product
12/3/08 12:30:48 a.m.	Hecker fwd to Bowser to print message from Mark Peterson (atty)	Russ and Jeff Ward		Attorney-Client Privilege; work product
12/3/08 5:19:05 p.m.	Hecker, Jody Edwards (CO atty), Dove	Monarch on the Park		Attorney-Client Privilege; work-product; irrelevant
12/3/08 5:27:05 p.m.	Hecker fwd to Kaplan to print message from Cutler	Advantage Tax Audits		Attorney-Client Privilege; work product;
12/3/09 5:27:03 p.m.	Hecker fwd to Kaplan to Print message from Jody Edwards	Monarch on the Park		Attorney-Client Privilege; work-product; irrelevant
11/15/08 12:52:02 p.m.	Denny Hecker/Erik Dove Forwarded message chain including Bruce Parker and Mike Givens	Marshall Bank financing		Attorney-client privilege
11/16/08 3:51:01 p.m.	Denny Hecker/Erik Dove/Bruce Parker/Clint Cutler	CFC Fleet		Attorney-Client privilege
11/16/08 7:06:01 p.m.	Denny Hecker/Clint Cutler	Draft email to CFC		Attorney-client privilege; work-product
11/15/08 6:18:05 p.m.	Denny Hecker/Bruce Parker.Erik Dove/Clint Cutler	Communications re: Marshall bank		Attorney-Client privilege
11/15/08 6:19:01 p.m.	Denny Hecker/Tam Hecker	Fwd: message re: Marshall bank		Spousal privilege
11/15/08 5:09:04 p.m.	Denny Hecker/Erik Dove/Clint Cutler/Tim Kelly/Bruce Parker	Communication re: CFC conference call		Attorney-Client privilege.
11/18/08 4:56:00	Denny Hecker/Bruce Parker	Communication re: strategy		Attorney-Client privilege

a.m.	Denny Hecker/Erik Dove/Bruce Parker	Communication re: Chrysler audit	Attorney-client privilege
11/16/08 12:41:01 p.m.			
11/09/08 10:09:02 a.m.	Denny Hecker/Donna Rizner/Erik Dove/Barbara Jerich	FWD: messages re: Chrysler Complaint from Bruce Parker/Molly Borg	Attorney-client privilege; work-product
12/19/08 11:05:04 a.m.	Hecker/Steve Bright reply including message from Cutler	Communication re: Ford vehicles	Attorney-Client privilege
12/22/08 8:25:00 a.m.	Hecker/Parker/Dove	Communications re: strategy	Attorney-client privilege
12/22/08 4:54:00	Hecker/Keith Phillips/Dove email chain including Bruce Parker	Communications re: Hertz	Attorney-Client privilege
12/22/08 5:04:02 p.m.	Hecker/Keith Phillips/Dove email chain including Bruce Parker	Communications re: Hertz	Attorney-Client privilege
12/22/08 5:20:03 p.m.	Hecker/Dove email chain including Bruce Parker	Communications re: Hertz	Attorney-client privilege
12/22/08 6:15:00 p.m.	Hecker/Dove chain including Bruce Parker	Communications re: Hertz	Attorney-client privilege
12/22/08 7:09:01 p.m.	Hecker/Dove chain including Bruce Parker	Communications re: hertz	Attorney-client privilege
10/16/08 9:10:02 p.m.	Hecker/Dove chain including Clint Cutler	Communications re: legal advice	Attorney-client privilege
10/20/08 6:53:03 a.m.	Hecker/Dove/Parker/Cutler	Communications re: legal advice	Attorney-Client Privilege
10/20/08	Hecker/Dove/Cutler/Parker	Communication re: email draft	Attorney-client privilege

6:58:04 a.m.				
10/20/08 7:13:01 a.m.	Hecker/Dove reply to chain including Parker and Cutler	Communications re: email draft		Attorney-Client Privilege
10/20/08 7:19:03 a.m.	Hecker/Parker/Dove/Cutler	Communications re: email draft		Attorney-client privilege
8/01/08 5:29:02 p.m.	Hecker/Dove/Erick Kaardal	Communication re: litigation strategy		Work product
12/17/08 8:56:05 p.m.	Hecker to Molly Kaplan fwd message from Erik Dove to Hecker and Parker	Communications re: legal advice		Attorney-client privilege
12/18/08 10:45:01 a.m.	Hecker to Dove reply to message including Cutler	Communications re: financing and legal advice		Attorney-client privilege
12/18/08 10:52:04 a.m.	Hecker to Dove reply to message including Cutler	Communications re: legal advice and financing		Attorney-client privilege
2/28/09 4:13:03 p.m.	Hecker/Corey-Edstrom	Communications re: Conference call		Attorney-client privilege
2/28/09 4:17:00 p.m.	Hecker/Dove/Parker	Communication re: Conference call		Attorney-client privilege
2/28/09 11:11:03 p.m.	Hecker/Parker/Dove	Communication re: enterprise asset purchase		Attorney-client privilege
3/1/09 4:15:00 p.m.	Hecker/Jerich fwd messages including parker	Communication re: Enterprise asset purchase		Attorney-Client Privilege
3/1/09	Hecker/Parker/Dove	Communication re: Enterprise		Attorney-client privilege

4:56:04 p.m.		negotiations		
3/2/09 7:34:04 p.m.	Hecker to Tam Hecker fwd message from Corey-Edstrom	Communication re: Advantage	Attorney-client privilege; spousal privilege	
11/17/08 6:36:00 p.m.	Hecker/Parker/Dove/Cutler/Borg	Communication re: CFC negotiation	Attorney-Client Privilege	
11/17/08 6:35:04 p.m.	Hecker/Parker/Dove/Cutler/Borg	Communication re: CFC negotiation	Attorney-Client Privilege	
11/17/08 6:44:05 p.m.	Hecker/Parker/Dove/Cutler/Borg	Communication re: CFC negotiations	Attorney-Client privilege	
11/17/08 5:17:02 p.m.	Hecker/Cutler	Communication re: legal strategy	Attorney-client privilege	
11/17/08 9:54:03 a.m.	Hecker/Cutler/Parker/Dove	Communication re: VW Hyundai purchase offers	Attorney-client privilege	
11/22/08 1:06:01 p.m.	Hecker/Cutler/Dove/Parker	Communication re: Expedia legal advice	Attorney-client privilege	
11/22/08 12:50:02 p.m.	Hecker/Parker/Cutler	Communication re: Phantom	Attorney-client privilege	
2/17/09 11:13:49 a.m.	Molly Kaplan to Hecker/Bowser reply regarding Parker email	Communication re: CFC Hecker foreclosure	Attorney-client privilege	
2/17/09 11:32:41 a.m.	Borg to Dove/Parker/Hecker/Kaplan/Bowser/Cutler	Communication re: CFC Hecker foreclosure	Attorney-client privilege	
2/17/09 11:35:56	Dove to Borg/Parker/Molly Kaplan/Hecker/Bowser/Cutler	Communication re: CFC Hecker foreclosure	Attorney-client privilege	

a.m.				
2/17/09 11:36:45 a.m.	Cutler to Borg/Parker/Molly Kaplan/Hecker/Dove/Bowser	Communications re: CFC Hecker foreclosure	Attorney-client privilege	
2/17/09 11:46:22 a.m.	Parker to Borg/Cutler/Hecker/Bowser/Molly Kaplan	Communication re: CFC Hecker Foreclosure	Attorney-client privilege	
2/17/09 11:47:18 a.m.	Borg to Dove/Parker/Hecker/Kaplan/Bowser/Cutler	Communication re: CFC Hecker foreclosure	Attorney-client privilege	
2/11/09 2:26:00 p.m.	Hecker to Bowser to Print Message from Molly Borg	Communication re: foreclosure actions	Attorney-client privilege	
2/11/09 9:08:02 p.m.	Hecker to Molly Kaplan to Print Message from Jerich	Communications re: Rosedale Dodge/ Vemarc LLC	Attorney-Client privilege	
10/22/08 3:15:02 p.m.	Hecker to Parker and Dove	Re: financing	Attorney-client privilege	
10/22/08 7:36:02 p.m.	Hecker to Tam Hecker fwd message to Parker	Re: repossession of cars	Attorney-client privilege; spousal privilege	
10/22/08 8:02:04 p.m.	Hecker to Tam Hecker	Re: repossession of cars	Attorney-client privilege; spousal privilege	
10/24/08 8:19:03 a.m.	Hecker fwd to Bowser to print message from Parker	Re: Dealership operating requirements	Attorney-client privilege	
10/24/08 2:18:00 p.m.	Hecker to Parker	Re: CFC letter	Attorney-client privilege	
10/25/08 12:27:05 p.m.	Hecker to Kuhlman, Dove, Parker	Re: Hyundai call	Attorney-client privilege	

10/25/08 12:31:03 p.m.	Hecker to Dove and Parker	Re: Hyundai call	Attorney-client privilege
10/25/08 1:19:00 p.m.	Hecker to Dove and Parker	Re: Hyundai and CFC	Attorney-client privilege
9/22/08 12:39:02 p.m.	Hecker to Dove	Re: legal fees issue	Attorney-client privilege
9/19/08 9:01:00 a.m.	Hecker fwd to Molly Kaplan to print message from Molly Borg	Re: warrant-dog issue	Attorney-client privilege
9/19/08 9:01:02 a.m.	Hecker to Molly Kaplan fwd message form Molly Borg	Re: warrant-dog issue	Attorney-client privilege
9/19/08 10:28:05 a.m.	Hecker to Molly Borg/Tam Hecker	Re: warrant-dog issue	Attorney-client privilege; spousal privilege
9/19/08 10:29:01 a.m.	Hecker fwd to Molly Kaplan email chain including Borg	Re: warrant-dog issue	Attorney-client privilege
9/19/08 10:41:05 a.m.	Hecker fwd to T. Hecker	Re: warrant-dog issue	Attorney-client privilege; spousal privilege
9/19/08 11:54:03 a.m.	Hecker to Molly Borg/T. Hecker	Re: warrant-dog issue	Attorney-client privilege; spousal privilege
9/19/08 11:58:03 a.m.	Hecker fwd to Molly Kaplan chain including Molly Borg	Re: warrant-dog issue	Attorney-client privilege
9/18/08 6:06:06 p.m.	Denny Hecker fwd to T. Hecker message from Molly Borg	Re: warrant-dog issue	Attorney-client privilege
11/28/08	Hecker fwd to Chris McIntyre Message from	Re: Eaglerider agreement	Attorney-client privilege; work-

7:51:02 p.m.	Parker			product
11/27/08 1:29:03 p.m.	Hecker fwd to T. Hecker message from Parker	Re: Eaglerider		Attorney-client privilege; work-product; spousal privilege
11/28/08 12:10:04 p.m.	Hecker fwd to Molly Kaplan to print message from Dove and Parker	Re: US Bank lines of credit		Attorney-client privilege; work-product
11/28/08 12:11:03 p.m.	Hecker to Dove and Susan Miller re: message including Parker	Re: US Bank credit		Attorney-client privilege; work-product
11/28/08 12:17:01 p.m.	Hecker to Dove re; message to Parker	Re: U.S. Bank credit		Attorney-client privilege; work-product
10/24/08 7:03:05 a.m.	Hecker to Dove re: messages including Parker	Re: Hertz		Attorney-client privilege; work-product
10/24/08 7:03:00 a.m.	Hecker to Dove re: messages including Parker	Re: Hertz		Attorney-client privilege; work-product
10/24/08 7:32:05 a.m.	Hecker to Dove re: messages including Parker	Re: Hertz		Attorney-client privilege; work-product
1/28/09 11:13:03 a.m.	Hecker to Hage, Dove, Parker	Re: Abbra		Attorney-Client Privilege; work-product; irrelevant
1/24/09 12:22:09 p.m.	Hecker to Dove, Parker, Borg	Re: Chrysler Complaint		Attorney-client privilege
1/24/09 12:30:01 p.m.	Hecker to Parker, Cutler, Dove, Volk, Borg, Strangis	Re: Chrysler Complaint		Attorney-client privilege
1/25/09 11:22:05	Hecker to Borg	Re: statement		Attorney-client privilege; work-product

a.m.				
1/18/09 9:46:01 p.m.	Hecker to T. Hecker fwd messages including Parker and Cutler	Re: Advantage IOI	Attorney-client privilege; work-product; spousal privilege	
1/19/09 10:08:05 a.m.	Hecker to Molly Kaplan fwd message including Parker	Re: Land Rover	Attorney-client privilege	
12/2/08 7:28:03 p.m.	Hecker to Dove re: message to Parker	Advantage financials	Attorney-Client Privilege; work product	
12/11/08 6:41:04 p.m.	Denny Hecker/Clint Cutler	Legal Strategy	Attorney-Client Privilege Work-Product	
12/12/08 10:18:00 a.m.	Denny Hecker/Bruce Parker	Legal Strategy	Attorney-Client Privilege; Work-Product	
12/12/08 10:58:01 a.m.	Denny Hecker/Greg Orthum/Bruce Parker/Eric Dove	Legal Strategy	Attorney-Client Privilege; Work-Product	
12/12/08 12:26:04 a.m.	Denny Hecker/Bruce Parker/Eric Dove	Forbearance Agreement - GMAC	Attorney-Client Privilege; work-product	
12/12/08 5:34:03 p.m.	Denny Hecker/Bruce Parker	Chrysler Financial	Attorney-Client Privilege; Work-product	
12/13/08 2:25:01 p.m.	Denny Hecker/Bruce Parker	Legal Strategy	Attorney-Client Privilege; work-product	
12/13/08 7:06:04 p.m.	Denny Hecker/ Bruce Parker/Eric Dove	Website issues	Attorney-Client Privilege; work-product	
11/08/08 7:32:00 p.m.	Denny Hecker/Bruce Parker	GMAC Complaint	Attorney-Client Privilege; work-product; irrelevant	

11/08/08 8:11:05 p.m.	Denny Hecker/Clint Cutler	Advantage filing	Attorney-Client Privilege; work product
11/08/08 8:29:04 p.m.	Denny Hecker/Bruce Parker	GMAC Complaint	Attorney-Client Privilege; work product
11/08/08 2:04:02 p.m.	Denny Hecker to Molly Borg, Erik Dove, Bruce parker	GMAC Complaint	Attorney-Client Privilege; work product
11/08/08 2:14:02 p.m.	Denny Hecker/Bruce Parker	Scheduled Meeting	Attorney-Client Privilege
11/08/08 5:00:01 p.m.	Denny Hecker to Erik Dove reply to message including Bruce Parker and Clint Cutler	Legal Strategy	Attorney-Client Privilege; work-product
11/08/08 7:27:02 p.m.	Denny Hecker / Bruce Parker / Clint Cutler / Erik Dove / Barbara Jerich	Legal Strategy	Attorney-Client Privilege; Work-Product
11/08/08 10:50:04 a.m.	Denny Hecker/ Clint Cutler / Barbara Jerich	Legal Strategy	Attorney-Client Privilege; Work Product
11/08/08 11:33:01 a.m.	Denny Hecker/ Bruce Parker / Clint Cutler / Erik Dove	Legal Strategy	Attorney-Client Privilege; Work Product
11/08/08 9:36:01 a.m.	Denny Hecker/Bruce Parker	Legal Strategy	Attorney-Client Privilege; Work Product
11/08/08 9:34:02 a.m.	Denny Hecker fwd to Barbara Jerich message from Dove to Parker	Legal Strategy	Attorney-Client Privilege; Work Product
11/08/08 9:34:04 a.m.	Denny Hecker/Erik Dove/Clint Cutler	Legal Strategy	Attorney Client-Privilege; Work Product
11/05/08	Denny Hecker / Tamitha Hecker	Chrysler Financial	Spousal Privilege

9:52:01 p.m.				
11/05/08 21:15:05	Bruce Parker / Denny Hecker/ Ralph Strangis	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 9:20:05 p.m.	Denny Hecker/Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 9:21:03 p.m.	Denny Hecker fwd to Dove message from Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 9:41:02 p.m.	Denny Hecker/Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 8:54:02 p.m.	Denny Hecker/Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 8:56:03 p.m.	Denny Hecker fwd to T. Hecker message from Parker	Chrysler Financial		Attorney-Client Privilege; Work-Product; Spousal privilege
11/05/08 7:56:00 p.m.	Denny Hecker Fwd to Dove, message including Roger Bjork (ee)/ Eric Dove/ Barbara Jerich / Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 7:52:01 p.m.	Denny Hecker/Bruce Parker/ Roger Bjork (ee) / Eric Dove/Barb Jerich	Legal Strategy		Attorney-Client Privilege; Work-Product
11/05/08 7:52:04 p.m.	Hecker fwd to Dove message including Parker	Legal Strategy		Attorney-Client Privilege; Work-Product
10/30/08 8:16:02 p.m.	Denny Hecker / Bruce Parker	Conference Call		Work-Product; Attorney-Client privilege
10/30/08 2:45:02 p.m.	Denny Hecker/ Bruce Parker	Hyundai		Attorney-Client Privilege; Work-Product

11/06/08 6:31:01 a.m.	Denny Hecker/ Bruce Parker	Chrysler Financial – Limited Interim Agreement	Attorney-Client Privilege; work- product
11/06/08 10:53:04 a.m.	Hecker to Bjork reply to message including Parker	Fleet Group Employees	Attorney-Client Privilege; Work- Product
11/04/08 10:04:03 p.m.	Denny Hecker/Eric Dove/ Bruce Parker	Legal Strategy	Attorney-Client Privilege
11/04/08 10:07:01 p.m.	Hecker fwd to T. Hecker message including Parker	Legal Strategy	Attorney-Client Privilege; spousal privilege
11/06/08 10:17:04 p.m.	Denny Hecker / Tamitha Hecker fwd message from Parker	Chrysler Financial - Limited Interim Agreement	Spousal Privilege
11/04/08 9:37:04 p.m.	Denny Hecker/Erick Dove/Bruce Parker/Barb Jerich	Legal Strategy	Attorney-Client Privilege; Work- Product
11/04/08 9:42:03 p.m.	Denny Hecker/ Parker	Legal Advice	Attorney-Client Privilege
11/04/08 9:42:04 p.m.	Hecker to T. Hecker fwd of message to Parker	Legal Advice	Attorney-Client Privilege; spousal privilege
10/31/08 9:11:03 a.m.	Denny Hecker/Bruce Parker/Eric Dove	Scheduling Meeting	Attorney-Client Privilege
10/31/08 9:47:00 a.m.	Denny Hecker/Eric Dove/Bruce Parker/ Barb Jerich / Dave Thomas	Legal Strategy	Attorney-Client Privilege; Work- Product
10/31/08 11:00:04 a.m.	Denny Hecker / Bruce Parker	Estate Taxes	Attorney-Client Privilege
10/31/08	Denny Hecker/ Sam Kaplan	Legal Advice	Attorney-Client Privilege

12:07:00 p.m.				
10/31/08 3:24:00 p.m.	Hecker fwd to Molly Kaplan / Erik Dove / Barbara Jerich message from Bruce Parker	Legal Strategy	Attorney-Client Privilege; Work Product	
10/30/08 8:47:04 p.m.	Denny Hecker/Bruce Parker/ Barb Jerich/Steve Bright (ee) / Erik Dove	Legal Strategy	Attorney-Client Privilege; Work Product	
10/30/08 6:58:03 p.m.	Hecker fwd to Hecker message from Borg	GMAC/ Legal Strategy	Attorney-Client Privilege; Work Product	
10/30/08 7:03:01 p.m.	Repeat of Above	GMAC/ Legal Strategy	Attorney-Client Privilege; Work Product	
11/04/08 5:46:00 p.m.	Denny Hecker/Bruce Parker	Follow up Communication	Attorney-Client Privilege	
11/04/08 11:55:05 a.m.	Denny Hecker/Clint Cutler; Bruce Parker/Eric Dove/Keith Phillips (ee)/Barb Jerich / Molly Kaplan	Chrysler Financial	Attorney-Client Privilege	
11/03/08 7:30:04 a.m.	Hecker fwd to Rizner to print message from Parker	Legal Strategy	Attorney-Client Privilege; Work Product	
11/04/08 10:23:03 a.m.	Denny Hecker/Bruce Parker/Susan Miller (ee)/ Erik Dove	Walden Leasing	Attorney-Client Privilege, Work-Product	
11/03/08 7:30:01 p.m.	Denny Hecker/Erick Dove/ Bruce Parker / chris McIntyre	Legal Strategy	Attorney-Client Privilege, Work-Product	
11/03/08 4:17:00 p.m.	Hecker to Susan Miler re. message including Parker	Legal Strategy	Attorney-Client privilege	
11/01/08 4:10:04	Denny Hecker to Erik Dove reply to message including Bruce Parker	Legal Strategy	Attorney-Client Privilege, Work-Product	

p.m.				
11/01/08 3:27:04 p.m.	Denny Hecker/Bruce Parker/Eric Dove	Legal Strategy	Attorney-Client Privilege, Work-Product	
11/01/08 3:44:00 p.m.	Denny Hecker/Bruce Parker/Eric Dove	Legal Strategy	Attorney-Client Privilege; Work-Product	
11/13/08 8:53:00 p.m.	Denny Hecker/Clint Cutler	Legal Strategy	Attorney-Client Privilege; Work-Product	
11/13/08 8:52:05 p.m.	Denny Hecker/Clint Cutler	Legal Strategy-	Attorney-client privilege, Work-Product	
11/12/08 11:12:00 a.m.	Denny Hecker/Barb Jerich/Eric Dove/Bruce Parker/Clint Cutler	Wells Fargo	Attorney-Client Privilege	
11/12/08 11:13:04 a.m.	Denny Hecker/Bruce Parker/Eric Dove/Client Cutler/Molly Borg	Legal Strategy	Attorney-Client Privilege; Work Product	
11/2/08 11:09:00 a.m.	Denny Hecker/Eric Dove/Bruce Parker Clint Cutler	Legal Strategy	Attorney-Client Privilege; Work Product	
11/12/08 11:06:02 a.m.	Denny Hecker/Molly Borg (atty)	Legal Strategy	Attorney-Client Privilege, work-product	
11/12/08 11:06:01 a.m.	Hecker fwd to Kaplan message to Borg	Legal Strategy	Attorney-Client Privilege, work-product	
11/12/08 11:06:02 a.m.	Hecker to Borg	Legal Strategy	Attorney-Client Privilege, work-product	
11/12/08 11:06:00	Denny Hecker/ Molly Borg (atty)	Communication	Attorney-Client Privilege	

a.m.	Hecker to Borg		Communication	Attorney-Client Privilege
11/12/08 11:05:04 a.m.				
11/12/08 11:03:03 a.m.	Denny Hecker/Eric Dove/Bruce Parker		Communication	Attorney-Client Privilege
11/12/08 10:58:04 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Cutler		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:58:04 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Cutler		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:05 a.m.	Denny Hecker/Erick Dove/Cutler; Molly Borg		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:04 a.m.	Denny Hecker/Eric Dove/Clint Cutler/Molly Borg		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:04 a.m.	Denny Hecker/Eric Dove/Clint Cutler/Molly Borg		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:03 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Molly Kaplan (ee)/Clint Cutler		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:02 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Cutler/Molly Borg		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:02 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Cutler		Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 10:59:01 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Cutler/ Molly Kaplan (ee)		Legal Strategy	Attorney-Client Privilege; Work Product

11/12/08 10:59:00 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler	Communication re: term sheet	Attorney-Client Privilege; Work Product
11/12/08 10:59:00 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Communication re: CFC	Attorney-Client Privilege, Work-Product
11/12/08 10:58:05 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Legal Strategy	Attorney-Client Privilege, Work-Product
11/12/08 10:58:05 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Legal Strategy	Work-Product; Expert Work-Product
11/12/08 10:58:03 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Legal Strategy	Work-Product; Expert Work-Product
11/12/08 6:01:02 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Legal Strategy	Attorney-Client Privilege; Work Product
11/12/08 6:19:04 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Client Cutler	Legal Strategy	Attorney-Client Privilege; Work Product
11/15/08 6:48:02 a.m.	Denny Hecker fwd to Jerich and Dove message from Parker	Legal Strategy	Attorney-Client Privilege; Work Product
11/05/08 6:48:05 a.m.	Hecker to Parker and Eric Dove	Letter of Credit	Attorney-Client Privilege; Work Product
11/05/08 6:55:01 a.m.	Hecker to Parker and Dove	Letter of Credit	Attorney-Client Privilege; Work Product
11/05/08 6:59:01 a.m.	Hecker to Dove and Parker	Letter of Credit	Attorney-Client Privilege; Work Product
11/05/08	Hecker to Dove Parker and Borg	Letter of Credit	Attorney-Client Privilege; Work

10:58:03 a.m.				Product	
11/12/08 10:41:00 a.m.	Denny Hecker/Bruce Parker/Erick Dove; Molly Borg / Cutler		Legal Strategy	Attorney-Client Privilege; Work Product	
11/12/08 10:47:05 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler / Borg		Communication	Attorney-Client Privilege	
11/12/08 10:43:04 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler		Communication	Attorney-Client Privilege	
11/12/08 10:38:03 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler/ Borg		Communication	Attorney-Client Privilege	
11/12/08 10:32:02 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler		Communication	Attorney-Client Privilege	
11/12/08 10:32:05 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Clint Cutler		Communication	Attorney-Client Privilege; Irrelevant	
11/12/08 10:26:01 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler		Communication	Attorney-Client Privilege	
11/12/08 9:32:03 a.m.	Denny Hecker/Erick Dove/Bruce Parker/Client Cutler		Communication	Attorney-Client Privilege	
11/11/08 2:51:05 p.m.	Denny Hecker/Roger Bjork(ee)/Eric Dove/Bruce Parker		Communication	Attorney-Client Privilege	
11/05/08 7:27:04 p.m.	Hecker Fwd to Dove message including Parker		Communication	Attorney-Client Privilege	
11/07/08 6:31:00	Denny Hecker/Bruce Parker		Legal Strategy	Attorney-Client Privilege	

p.m.			Legal Strategy		Attorney-Client Privilege; Work Product
11/07/08 9:45:02 p.m.	Denny Hecker/Clint Cutler/Bruce Parker/Ralph Strangis/Barbara Jerich/Erik Dove		Legal Strategy		Attorney-Client Privilege; Work Product
11/06/08 9:02:01 p.m.	Denny Hecker/Eric Dove/Bruce Parker/Barb Jerich/Keith Phillips		Legal Strategy		Attorney-Client Privilege; Work Product
11/08/08 10:04:02 p.m.	Hecker to Dove reply to message chain including Cutler		Legal Strategy		Attorney-Client Privilege; Work Product
11/08/08 10:05:04 p.m.	Hecker fwd to T. Hecker message from Bruce Parker/Molly Borg		Legal Strategy		Attorney-Client Privilege; work Product; Spousal privilege
11/08/08 10:05:02 p.m.	Hecker fwd to T. Hecker message from Bruce Parker		Legal Strategy		Attorney-Client Privilege; Work Product; spousal privilege
11/09/08 10:41:01 a.m.	Denny Hecker fwd to Tamitha Hecker message from Cutler		Communication		Attorney-client privilege; Spousal Privilege
11/09/08	Denny Hecker Fwd to Tamitha Hecker message from Bruce Parker		Communication		Attorney-client privilege; Spousal Privilege
11/14/08 2:02:01 p.m.	Denny Hecker/Erick Dove/Bruce Parker/Dave Thomas (ee)		Legal Strategy		Attorney-Client Privilege
11/14/08 2:13:03 p.m.	Denny Hecker/Erick Dove/Bruce Parker/Dave Thomas (ee)		Legal Strategy		Attorney-Client Privilege
11/11/08 11:00:01 a.m.	Hecker fwd to Bowser message from Bruce Parker/Erick Dove		Communication		Attorney-Client Privilege
11/11/08 12:18:03 p.m.	Denny Hecker/Erick Dove/ Bruce Parker/ Clint Cutler		Legal Strategy		Attorney-Client Privilege
11/10/08	Denny Hecker/Tamitha Hecker		Communication		Spousal Privilege

12:08:00 a.m.					
11/10/08 10:37:04 a.m.	Hecker fwd to Bowser to print message from Eric Dove to Clint Cutler	Legal Strategy		Attorney-Client Privilege; Work Product	
11/10/08 12:54:05 p.m.	Denny Hecker fwd to Bowser to print message from Bruce Parker	Legal Strategy		Attorney-Client Privilege; Work Product	
11/14/08 2:01:02 p.m.	Denny Hecker/Eric Dove/Bruce Parker/Clint Cutler	Legal Strategy		Attorney-Client Privilege	
11/14/08 2:38:05 p.m.	Denny Hecker/Bruce Parker	Communication		Attorney-Client Privilege	
11/16/08 2:40:02 p.m.	Denny Hecker/Frank Dankovich (ee)/Eric Dove/Jim Gustafson (ee)/Bruce Parker/ Clint Cutler; Darwin Lund (ee)/Tom Schwartz (ee)	Communication		Attorney-Client Privilege	
11/15/08 3:57:05 p.m.	Denny Hecker/Bruce parker/ Barb Jerich/ Molly Kaplan (ee)	M & I Bank		Attorney-Client Privilege	
11/15/08 1:36:03 a.m.	Denny Hecker/Tamitha Hecker	Communication		Spousal Privilege	
11/15/08 3:58:00 p.m.	Denny Hecker/Bruce Parker/Eric Dove/ Clint Cutler	Legal Strategy		Attorney-Client Privilege; Work Product	
11/14/08 8:41:01 p.m.	Denny Hecker/Tamitha Hecker	Communication		Spousal Privilege	
11/25/08 4:22:00 p.m.	Denny Hecker/Erick Dove/Bruce Parker	Communication		Attorney-Client Privilege	
11/26/08 8:21:00	Denny Hecker fwd to Molly Kaplan (ee) to print, message from Bruce Parker/ Clint	Legal Strategy		Attorney-Client Privilege; Work Product	

a.m.	Cutler			
11/26/08 8:20:03 a.m.	Denny to Molly Kaplan (ee) to print, message from Bruce Parker		Legal Strategy	Attorney-Client Privilege; Work Product
11/25/08 3:04:05 p.m.	Denny Hecker/Chris McIntyre (ee)/Eric Dove/Bruce Parker		Communication	Attorney-Client Privilege
11/1/08 9:12:02 a.m.	Denny Hecker/Eric Dove/Bruce Parker/Tom Mooney (ee)/ Barb Jerich		Communication	Attorney-Client Privilege
11/26/08 8:20:02 a.m.	Denny Hecker fwd to Molly Kaplan (ee) to print message from Bruce Parker		Legal Strategy	Attorney-Client Privilege; Work Product
11/26/08 8:20:01	Denny Hecker fwd to Molly Kaplan (ee) to print message from Bruce Parker		Legal Strategy	Attorney-Client Privilege; Work- Product
11/24/08 4:20:21 p.m.	Hecker fwd to Bowser to print message including Parker		Car Rental Agreements	Attorney-Client Privilege; Work- Product
11/24/08 6:47:05 p.m.	Denny Hecker fwd to Molly Kaplan (ee) to print message from David Uhlig (atty)		Legal Documents	Attorney-Client Privilege; Work- Product
11/05/08 9:10:00 a.m.	Denny Hecker/ Eric Dove/Bruce Parker		Communication	Attorney-Client Privilege
11/24/08 11:59:05 p.m.	Denny Hecker/ Eric Dove/Bruce Parker		Consulting Services	Attorney-Client Privilege
10/28/08 3:44:03 p.m.	Denny Hecker/Bruce Parker		Communication	Attorney-Client Privilege
10/28/08 5:54:05 p.m.	Denny Hecker/Bruce Parker		Communication	Attorney-Client Privilege
10/28/08	Denny Hecker/Bruce Parker / Dove / Jerich /		Communication	Attorney-Client Privilege

7:19:00 p.m.	Terhaar / Ralph Strangis			
10/28/08 8:25:01 p.m.	Denny Hecker/Tamitha Hecker	Communication		Spousal Privilege
10/29/08 7:19:01 a.m.	Denny Hecker/Bruce Parker/ Dove/Cutler	Follow up Legal Documents		Attorney-Client Privilege; Work Product
10/29/08 3:48:00 p.m.	Denny Hecker/Bruce Parker/Eric Dove	Communication		Attorney-Client Privilege
10/29/08 5:26:04 p.m.	Denny Hecker/Bruce Parker	Communication		Attorney-Client Privilege
10/29/08 11:47 a.m.	Robert Johnson (atty)/Bill Mohrman (atty)	Legal Strategy		Attorney-Client Privilege; Work Product
10/29/08 9:12:00 p.m.	Denny Hecker/Tamitha Hecker	Communication		Spousal Privilege
10/30/08 10:58:04 a.m.	Denny Hecker/Dave Thomas (ee)/Barb Jerich/Erick Dove/Bruce Parker/Clint Cutler	Communication		Attorney-Client Privilege
10/25/08 5:10:00 p.m.	Denny Hecker/Eric Dove/Bruce Parker	Communication		Attorney-Client Privilege
10/26/08 10:25:01 a.m.	Denny Hecker/Erick Dove/Bruce Parker/ Ralph Strangis/Sam Kaplan	Communication		Attorney-Client Privilege
10/26/08 10:54:05 a.m.	Denny Hecker/Bruce Parker	Communication		Attorney-Client Privilege
10/26/08 1:28:03 p.m.	Denny Hecker/Bruce Parker/Clint Cutler/Eric Dove	Legal Strategy		Attorney-Client Privilege; Work Product

10/26/08 1:28:00 p.m.	Denny Hecker/Eric Dove/Barb Jerich/Bruce Parker/Clint Cutler	Legal Strategy	Attorney-Client Privilege; Work Product
10/26/08 3:28:01 p.m.	Denny Hecker/Erick Dove/Bruce Parker	Communication	Attorney-Client Privilege
10/26/08 9:03:04 p.m.	Denny Hecker/Bruce Parker	Consultants	Attorney-Client Privilege
10/27/08 1:11:03 p.m.	Denny Hecker fwd to Eric Dove messages between Bruce Parker/ Jim Gustafson (ee)	Legal Strategy	Attorney-Client Privilege; Work Product
10/27/08 6:22:00 p.m.	Denny Hecker/Tamitha Hecker	Communication	Spousal Privilege
10/28/08 10:55:02 a.m.	Denny Hecker/Bruce Parker	Legal Strategy	Attorney-Client Privilege; Work Product
10/28/08 11:00:02 a.m.	Hecker to Parker	Legal Strategy	Attorney-Client Privilege; Work Product
10/28/08 12:44:00 p.m.	Denny Hecker/Susan Rhode (atty)	Communication	Attorney-Client Privilege
10/28/08 1:27:04 p.m.	Denny Hecker/Bruce Parker	Communication	Attorney-Client Privilege
10/28/08 2:00:03 p.m.	Bruce Parker/Denny Hecker	Communication	Attorney-Client Privilege
10/28/08 3:21:00 p.m.	Denny Hecker/Bruce Parker	Communication	Attorney-Client Privilege
10/28/08	Denny Hecker/Bruce Parker	Communication	Attorney-Client Privilege

3:27:03 p.m.				
10/28/08 3:41:02 p.m.	Denny Hecker/Susan Rhode (atty)		Communication	Attorney-Client Privilege
4/15/09 1:41:52 p.m.	Hecker fwd to Bowser to print message from Dennis Knoer (atty)		Legal Documentation	Attorney-Client Privilege; Work Product
4/16/09 7:31:05 a.m.	Hecker fwd to Bowser to print message from Dennis Knoer (atty)		Legal Documentation / Revised	Attorney-Client Privilege; Work Product
4/16/09 3:22:16 p.m.	Hecker to Bowser to print message from Dennis Knoer/Bruce Parker/Erick Dove		Legal Documentation	Attorney-Client Privilege; Work Product
3/23/09 2:08:47 p.m.	Hecker to Bowser to print message from Bruce Parker/Denny Hecker		Communication	Attorney-Client Privilege; Work Product
3/1/08 4:01:00 p.m.	Denny Hecker/ Bruce Parker		Communication	Attorney-Client Privilege; Work Product
3/2/09 8:03:01 a.m.	Denny Hecker/Eric Dove/Bruce Parker		Communication	Attorney-Client Privilege
3/2/09 1:24:01 p.m.	Denny Hecker/Bruce Parker		Communication	Attorney-Client Privilege
3/2/09 1:32:02 p.m.	Denny Hecker/Bruce Parker		Communication	Attorney-Client Privilege
2/28/09 6:32:01 a.m.	Denny Hecker/Bruce Parker/Eric Dove		Communication	Attorney-Client Privilege
3/1/09 15:57:22	Bruce Parker/Rondal Haglof, Atty		Legal Documents	Attorney-Client Privilege/ Work Product

3/1/09 4:01:03 p.m.	Hecker to Parker, Haglof, Corey-Edstrom, Thomas Laffey, Lee Kaplan, Jeffery Cowan, David Lander, Erik Dove	Legal Strategy	Attorney-Client Privilege/ Work Product
2/28/09 4:07:00 p.m.	Denny Hecker/Barb Peppersack (atty)/Eric Dove/Bruce Parker/ Corey-Edstrom, Bradley Hennen	Communication	Attorney-Client Privilege
11/8/08 4:13:02	Hecker to Parker	Legal advice	Attorney-client privilege
11/8/08 5:03:04 p.m.	Hecker to Dove reply to email chain including Parker and Cutler	Communications re: Cerberus	Attorney-client privilege
11/13/08 8:18:02 p.m.	Hecker to Cutler	Legal Strategy	Attorney-client privilege